

EXHIBIT 2

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS
Hyunhuy Nam on 02/22/2022

1 UNITED STATES DISTRICT COURT
2 SOUTHERN DISTRICT OF NEW YORK

3 Case No.: 1:21-CV-06165
4 -----

5 HYUNHUY NAM,

6 Plaintiff,

VIDEOCONFERENCE
DEPOSITION OF:
HYUNHUY NAM

7 -against-

8 PERMANENT MISSION OF THE REPUBLIC
9 OF KOREA TO THE UNITED NATIONS,

10 Defendants.
11 -----
12

13 TRANSCRIPT of the testimony of HYUNHUY NAM in
14 the above-entitled matter, as taken by and before
15 CELESTE A. GALBO, a Certified Court Reporter and
16 Notary Public of the State of New Jersey, held at the
17 offices of Kim, Cho & Lim, LLC, 460 Bergen Boulevard,
18 Palisades Park, New Jersey, on February 22, 2022,
19 commencing at 10:09 a.m.
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800-333-2082

HYUNHUY NAM vs PERMANENT MISSION OF REPUBLIC OF KOREA TO UNITED NATIONS**Hyunhuy Nam on 02/22/2022****Pages 6..9**

<p style="text-align: right;">Page 6</p> <p>1 FRAN YOON, was duly sworn by the Notary Public to</p> <p>2 interpret the proceedings from English to Korean, and</p> <p>3 from Korean to English.</p> <p>4 HYUNHUY NAM, residing at 128 W. Central Boulevard,</p> <p>5 Palisades Park, New Jersey 07680 having been duly</p> <p>6 sworn by the Notary Public, was examined and</p> <p>7 testified as follows:</p> <p>8 EXAMINATION</p> <p>9 BY MR. LIM:</p> <p>10 Q. All right. Good morning, Mr. Nam. Let</p> <p>11 me briefly introduce myself. My name is Joshua Lim.</p> <p>12 I am one of the attorneys representing the defendant</p> <p>13 in this case Permanent Mission of the Republic of</p> <p>14 Korea to the United Nations. To my right my</p> <p>15 associate Sean Kwak is present. From time to time if</p> <p>16 necessary, Mr. Sean may also ask you some questions,</p> <p>17 although I'll be the one taking the meeting today.</p> <p>18 Okay. And for purposes of today's</p> <p>19 proceeding I'm going to refer to the defendant as</p> <p>20 "the Mission". No other name should be used for the</p> <p>21 purpose of clarity and consistency. So, when you're</p> <p>22 testifying, I want you to consistently refer to -- I</p> <p>23 guess perhaps I'm asking Ms. Yoon, the translator, to</p> <p>24 refer to the defendant as the Mission.</p> <p>25 A. Understood.</p>	<p style="text-align: right;">Page 8</p> <p>1 why you're doing it, however, you have to verbalize,</p> <p>2 verbalize your response at all times. Let me explain</p> <p>3 what I mean by that. If you shake your head or nod,</p> <p>4 that is not a sufficient response. Why? Because the</p> <p>5 court reporter today, she'll take down whatever I say</p> <p>6 or whatever you say, whatever is discussed in this</p> <p>7 proceeding. Later on she'll produce what we call a</p> <p>8 transcript. And when we look at the transcript, if</p> <p>9 you shook your head or nod it and later on when we</p> <p>10 try to use it for future proceedings in the court, we</p> <p>11 don't know what you meant by that. Hence, it is very</p> <p>12 important for you to verbalize your response with the</p> <p>13 assistance of the interpreter, Ms. Yoon.</p> <p>14 Do you understand that, sir?</p> <p>15 A. Yes.</p> <p>16 Q. Number two, from time to time your good</p> <p>17 counsel may say what we call objection. But under</p> <p>18 the court rules, they cannot do speaking objection.</p> <p>19 In other words, they cannot object in a way that</p> <p>20 coaches you how to answer. He cannot tell you how to</p> <p>21 answer or what to say. That is strictly prohibited</p> <p>22 by rule. All they can do, they can just say</p> <p>23 objection to the form. If they say objection to the</p> <p>24 form, allow their objection to be placed on the</p> <p>25 record and move on, you still have to answer my</p>
<p style="text-align: right;">Page 7</p> <p>1 Q. Now, you are here for a proceeding</p> <p>2 known as a deposition. Have you been deposed before?</p> <p>3 A. Yes.</p> <p>4 Q. When was the last time that you were</p> <p>5 deposed?</p> <p>6 A. About 2011.</p> <p>7 Q. Okay. Why did you have to be deposed?</p> <p>8 A. It was a deposition concerning a</p> <p>9 workers' comp case with CRST Trucking Company.</p> <p>10 Q. So that's back in what, 2010 or '11?</p> <p>11 A. Correct.</p> <p>12 Q. Since then are you saying that you've</p> <p>13 never been deposed until today?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Now, I'm going to give you some</p> <p>16 rules. I know you were deposed once before, but</p> <p>17 these are the cardinal rules that will control</p> <p>18 today's proceeding. These are very important and I</p> <p>19 expect you to abide by these rules at all times from</p> <p>20 the beginning to the end.</p> <p>21 Number one, I'm going to ask you a</p> <p>22 number of questions related to the lawsuit that you</p> <p>23 brought against my client, that you'll be asked to</p> <p>24 answer all my questions. And when you answer my</p> <p>25 questions, I know you're wearing a mask, I understand</p>	<p style="text-align: right;">Page 9</p> <p>1 question. Understand?</p> <p>2 A. Yes.</p> <p>3 Q. And there is a confidentiality order</p> <p>4 signed by Judge Nathan. Let me explain to you the</p> <p>5 legal significance of that. Before we begin, counsel</p> <p>6 and I, your counsel, we discussed and we agreed that</p> <p>7 if you're about to say something that is considered</p> <p>8 confidential, we're going to go off the record and</p> <p>9 discuss how it should be handled first and then we're</p> <p>10 going to go back to the record.</p> <p>11 Do you understand this, sir?</p> <p>12 A. Yes.</p> <p>13 Q. And I don't think it will happen but</p> <p>14 I'm going to tell you anyhow, if you're about to say</p> <p>15 something that involves your communication with your</p> <p>16 counsel, I'm not entitled to know and I don't want to</p> <p>17 know. So you don't have to tell me what you</p> <p>18 discussed with your counsel and I'm not entitled to</p> <p>19 know. Okay?</p> <p>20 A. Understood.</p> <p>21 Q. Barring that, you have to answer all my</p> <p>22 questions today.</p> <p>23 A. Understood.</p> <p>24 Q. Rule number three, this is by far the</p> <p>25 most important rule of all. If you look around there</p>

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<p>1 is no judge or jury today, however, Mr. Nam, the</p> <p>2 answer you're about to give has the same force and</p> <p>3 effect as if you're testifying in a court of law.</p> <p>4 You raised your right hand, you're under oath. You</p> <p>5 understand that, right? That means if you willfully</p> <p>6 lie that you will be subjected to punishment.</p> <p>7 You understand that, sir?</p> <p>8 A. Yes.</p> <p>9 Q. So no speculation, no guess, no</p> <p>10 exaggeration, facts, facts, and facts only. Are we</p> <p>11 clear about this?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And luckily with the cooperation</p> <p>14 of your good counsel we already have most of the</p> <p>15 answers, we just want to confirm a few things.</p> <p>16 You understand that?</p> <p>17 A. Yes.</p> <p>18 Q. By the way, I have to commend your good</p> <p>19 counsel, your counsel has been very cooperative and</p> <p>20 courteous throughout the proceeding, and we</p> <p>21 anticipate that we'll continue to work together well.</p> <p>22 Now, we have a translator for a reason.</p> <p>23 You have to go through the translator at all times.</p> <p>24 The reason why I'm telling you this is because you</p> <p>25 may understand some English, so from time to time you</p>	<p>1 federal ruling in the matter, you're not allowed to</p> <p>2 discuss your prior testimony with your counsel during</p> <p>3 a break. You can talk to your counsel about other</p> <p>4 things, but you cannot talk your counsel during the</p> <p>5 break about, hey, how did I do, should I go back and</p> <p>6 change my answer. You are not allowed to do that.</p> <p>7 In that case under the case rule, we're allowed to</p> <p>8 ask you and your counsel what you actually discussed.</p> <p>9 In other words, that attorney/client privilege may be</p> <p>10 lifted. So I just wanted to be careful about that.</p> <p>11 Okay, go ahead, sir.</p> <p>12 MR. ZHU: So just I instruct you that</p> <p>13 you need to wait for the answer -- I'm sorry, wait</p> <p>14 for the question before you give the answer.</p> <p>15 MR. LIM: Thank you. I appreciate</p> <p>16 that.</p> <p>17 Q. Mr. Nam, we have your full name here as</p> <p>18 indicated in the caption Hyunhuy Nam; is that</p> <p>19 correct?</p> <p>20 A. Hyunhuy Nam.</p> <p>21 Q. Okay. Do you have an English name?</p> <p>22 A. No.</p> <p>23 Q. Okay. Your date of birth is April 9,</p> <p>24 1960?</p> <p>25 A. Correct.</p>
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<p>1 may just blurt out your answers in English. If you</p> <p>2 continue to speak in English and then I'll ask your</p> <p>3 counsel whether or not you really need a translator.</p> <p>4 Do you understand?</p> <p>5 A. Understood.</p> <p>6 Q. So you have to go through the</p> <p>7 translator at all times.</p> <p>8 Now, before we begin, is there any</p> <p>9 reason at all that may impair your ability to tell</p> <p>10 the truth today, physical, psychological or</p> <p>11 otherwise? Do you have any reason at all that it</p> <p>12 will make it difficult for you to tell the truth?</p> <p>13 A. No.</p> <p>14 Q. Okay. So you're ready to tell the</p> <p>15 truth?</p> <p>16 A. Correct.</p> <p>17 Q. To all the questions, correct?</p> <p>18 A. Correct.</p> <p>19 MR. ZHU: One instruction to the</p> <p>20 witness --</p> <p>21 MR. LIM: I forgot one --</p> <p>22 MR. ZHU: Go ahead.</p> <p>23 MR. LIM: Thank you.</p> <p>24 Q. We'll probably take a break from time</p> <p>25 to time, but under the Judge Salas' rule, it's a</p>	<p>1 Q. Are you currently residing at 128 West</p> <p>2 Central Boulevard, Palisades Park, New Jersey?</p> <p>3 A. Yes.</p> <p>4 Q. However, during the course of your</p> <p>5 employment at the Mission, you reside at 55 West</p> <p>6 Homestead Avenue, correct, 55?</p> <p>7 A. 55, yes.</p> <p>8 Q. Are you married?</p> <p>9 A. Yes.</p> <p>10 Q. With children?</p> <p>11 A. Yes.</p> <p>12 Q. Who are you living with today?</p> <p>13 A. With my wife.</p> <p>14 Q. Anyone else?</p> <p>15 A. From time to time my daughter comes to</p> <p>16 visit us.</p> <p>17 Q. So you're just living with your wife;</p> <p>18 is that correct?</p> <p>19 A. Correct.</p> <p>20 Q. Let's go over your employment history.</p> <p>21 Are you currently employed?</p> <p>22 A. Yes.</p> <p>23 Q. Where are you working?</p> <p>24 A. Sunrise, LLC.</p> <p>25 Q. Where is it?</p>

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1	A.	In Secaucus.	1	A.	Well, I didn't work as a truck driver
2	Q.	What kind of company is this?	2		continuously, so it's difficult to say. But I would
3	A.	It's a trucking company.	3		say about ten years.
4	Q.	How many hours do you work there?	4	Q.	When did you come to the United States?
5	A.	40 hours a week.	5		MR. ZHU: Objection. Relevancy.
6	Q.	When did you start working for this	6		You can answer.
7	company?		7	A.	Well, I can't recall if it was January
8	A.	July 29, 2021.	8		2007 or 2008, however it was after 2007 and my entire
9	Q.	Do you have any other job other than	9		family emigrated to this country in or around January
10	this?		10		2017 -- not 2017 but 2007.
11	A.	No.	11	Q.	You just talked about your family. My
12	Q.	Okay. Prior to that, where did you	12		question is, when did you come to the United States?
13	work?		13		MR. ZHU: Objection. Asked and
14	A.	My last job prior to my current job was	14		answered.
15		at the Mission. And after my work was terminated for	15		You can answer.
16		one month, I didn't work, and then I started working	16	A.	I visited this country or I came -- I
17		for Sunrise, LLC.	17		was back and forth in this country many times, so.
18	Q.	How much are you earning now?	18	Q.	My question is, when did you immigrate
19		MR. ZHU: Objection. Relevance.	19		to the United States?
20		You can answer.	20		MR. ZHU: Objection to you inquiring
21	A.	On average about \$4,000.	21		about the immigration status.
22	Q.	4,000 a month?	22		MR. LIM: Counsel, let me remind you of
23	A.	Yes.	23		the case, the KOTRA case. One of the factors the
24		MR. ZHU: Interpreter, if you can maybe	24		Court considered was the nationality of the
25		translate my objection to the witness.	25		plaintiff. Okay? So that's the reason why I'm
Page 15			Page 17		
1		THE INTERPRETER: Sure. Sure.	1		asking. You can put an objection on the record but
2	Q.	What is your highest level of	2		it's relevant. Okay.
3	education?		3	Q.	So, sir, I can care less about whether
4	A.	Four-year university.	4		you're legal or illegal. I don't care about that.
5	Q.	Where?	5		My question is are you South Korean national?
6	A.	Seoul.	6	A.	Yes.
7	Q.	What's the name of the school?	7	Q.	You're not a naturalized American
8	A.	Sungkyunkwan University.	8		citizen yet, correct?
9	Q.	What did you study?	9	A.	Correct.
10	A.	Okay. My major was in German language	10	Q.	After you came to the United States,
11		and minored in administration.	11		would it be fair to say that most of the time you
12	Q.	Prior to working at the Mission, where	12		worked as a truck driver?
13	did you work?		13	A.	Yes.
14	A.	Cora Express, C-O-R-A.	14	Q.	When you worked as a truck driver, was
15	Q.	Where is it?	15		your driving just limited to East Coast area or
16	A.	In Hackensack. It's near Hackensack, I	16		certain areas or did you drive across the country?
17		don't know the specific town.	17	A.	Across the country.
18	Q.	What did you do there?	18	Q.	Do you speak some English?
19	A.	It's a trucking company.	19	A.	Just enough to get by as a truck
20	Q.	Were you a truck driver?	20		driver.
21	A.	Yes.	21	Q.	Would you say that your English is a
22	Q.	How long did you work there for?	22		conversational level?
23	A.	Two years.	23	A.	Well, I wouldn't say perfect, however,
24	Q.	Prior to your working at the Mission,	24		I am able to take job instructions.
25		how long did you work as a truck driver?	25	Q.	And you can carry out those job

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<p>1 instructions?</p> <p>2 A. Correct.</p> <p>3 Q. Would you consider yourself an</p> <p>4 experienced driver?</p> <p>5 A. Yes.</p> <p>6 Q. Would you say that you are a very</p> <p>7 reliable driver?</p> <p>8 A. Yes.</p> <p>9 Q. Would you say that you operate the</p> <p>10 vehicle in a very safe manner?</p> <p>11 A. Yes.</p> <p>12 Q. How many accidents have you had in the</p> <p>13 past?</p> <p>14 A. If you're talking about a car accident,</p> <p>15 there was only one minor car accident.</p> <p>16 Q. But otherwise you consider yourself a</p> <p>17 very reliable, safe driver?</p> <p>18 MR. ZHU: Objection. Asked and</p> <p>19 answered.</p> <p>20 A. Correct.</p> <p>21 Q. Would you say you are very familiar</p> <p>22 with the road areas in northern New Jersey?</p> <p>23 A. I am very familiar with the roads in</p> <p>24 Connecticut and New Jersey.</p> <p>25 Q. Okay. How did you find out about the</p>	<p>1 Q. Chauffeur. Did you have an interview?</p> <p>2 A. Yes.</p> <p>3 Q. I'm not going to ask you to identify</p> <p>4 the name of the person that you interviewed with, you</p> <p>5 can just go by the last name.</p> <p>6 A. Choi.</p> <p>7 Q. At the time did you bring your resume</p> <p>8 to the interview?</p> <p>9 A. Yes.</p> <p>10 Q. Do you have a copy of your resume?</p> <p>11 A. No, I don't.</p> <p>12 Q. Did you throw it away?</p> <p>13 A. I submitted it with all other</p> <p>14 documents.</p> <p>15 Q. To who?</p> <p>16 A. So, at the time I was sent a Mission's</p> <p>17 form, so I filled it out and submitted it to the</p> <p>18 Mission.</p> <p>19 Q. During the interview did they ask you</p> <p>20 whether or not you are familiar with the areas New</p> <p>21 York and New Jersey?</p> <p>22 A. Yes.</p> <p>23 Q. Did it also ask you whether or not you</p> <p>24 are a safe driver?</p> <p>25 A. Yes.</p>
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<p>1 job opportunity at the Mission?</p> <p>2 A. I found out through HeyKorean. It's a</p> <p>3 Korean post or portal. There was a job listing in</p> <p>4 March of 2016.</p> <p>5 Q. Were you aware that the same job ad was</p> <p>6 also available on the website of the Mission?</p> <p>7 A. I didn't know.</p> <p>8 Q. Did you ever know that it was available</p> <p>9 on the website of the Mission?</p> <p>10 A. By 2020 when this case was already</p> <p>11 filed, I knew about it. So as I asked my attorney</p> <p>12 and I actually went to the website of the Mission to</p> <p>13 see if there were such listings available on the home</p> <p>14 page.</p> <p>15 Q. Now, how did you reach out to the</p> <p>16 Mission for a job interview? Did you call them? Did</p> <p>17 you email them?</p> <p>18 A. I followed the instructions of the</p> <p>19 posting in or on HeyKorean.</p> <p>20 Q. What were the instructions?</p> <p>21 A. Based on my recollection, I believe I</p> <p>22 was supposed to contact via email.</p> <p>23 Q. What was the position and title you</p> <p>24 applied for?</p> <p>25 A. Driver, chauffeur.</p>	<p>1 Q. Did you answer -- how did you answer to</p> <p>2 all these questions?</p> <p>3 MR. ZHU: Objection. Compound.</p> <p>4 Q. How did you answer?</p> <p>5 A. I can't recall.</p> <p>6 Q. Did they also ask you whether or not</p> <p>7 you are able to keep information you will acquire</p> <p>8 while working for the Mission secret?</p> <p>9 A. No, not at the interview. There was no</p> <p>10 mention of me being able to keep a secret was not</p> <p>11 mentioned during my interview.</p> <p>12 Q. Was it ever mentioned afterwards?</p> <p>13 A. Yes, the first day of my job when I</p> <p>14 arrived at the Mission bringing the minister, that's</p> <p>15 when I was told. Well, I mean, they didn't really go</p> <p>16 into specifics about keeping information</p> <p>17 confidential, however, when I asked them what type of</p> <p>18 organization the Mission was, I was told what the</p> <p>19 organization was.</p> <p>20 Q. Okay. Now, we're going to get there.</p> <p>21 Who offered you a job? You can just tell me the last</p> <p>22 name of the person.</p> <p>23 A. Mr. Jo was the one who notified me.</p> <p>24 Q. Okay. Did he call you?</p> <p>25 A. Yes.</p>

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1	Q.	Okay. You accepted that offer?	1	A.	Well, it's a pledge agreement that I
2	A.	Yes.	2		would pledge to abide by the terms.
3		MR. LIM: Okay. I'm going to mark D-1.	3	Q.	Okay. You signed it?
4		These are the contracts.	4	A.	Correct.
5		(Defendant's Exhibit 1, 2016 contract	5	Q.	Voluntarily?
6		and translation, was marked for	6	A.	Yes.
7		identification.)	7	Q.	You had every intention and duty to
8		(Discussion off the record.)	8		abide why the terms of the contract, correct?
9	Q.	All right. Mr. Nam, we just handed to	9	A.	Correct.
10		you what's been marked as D-1. We're going to spend	10	Q.	And according to this employment
11		a little time identifying the documents that have	11		contract, your employment began on July 1, 2016?
12		been marked as exhibits.	12	A.	Correct.
13		Now, do you recognize these documents,	13	Q.	And the term of the contract was only
14		sir?	14		one year, correct?
15	A.	Yes.	15	A.	Yes.
16	Q.	What is this?	16	Q.	Now, before you signed it, did you have
17	A.	It's an employment contract for	17		an opportunity to read and understand the terms in
18		chauffeur.	18		the contract?
19	Q.	Now, let's go to the last page of the	19	A.	No.
20		contract. Do you see that -- no, that's different,	20	Q.	You did not read?
21		second to the last.	21	A.	Correct.
22		Now, that's the last page of the	22	Q.	You did not even understand?
23		employment contract for chauffeur?	23		MR. ZHU: Objection. Asked and
24	A.	Yes.	24		answered.
25	Q.	Do you see your signature there?	25	Q.	Go ahead.
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1	A.	Yes.	1	A.	Typically as an employee I had to agree
2	Q.	You signed it?	2		with all the terms that was presented to me, so I had
3	A.	Yes.	3		to sign.
4	Q.	You signed it voluntarily?	4	Q.	Okay. Did you ever read this contract
5	A.	Yes.	5		afterwards?
6	Q.	No one forced you to sign it, correct?	6	A.	Yes, once.
7	A.	Correct.	7	Q.	Okay. You read it?
8	Q.	At the time you signed it, you had	8		MR. ZHU: Objection. Asked and
9		every intention to abide by the terms of this	9		answered.
10		contract, correct?	10	A.	Yes.
11		MR. ZHU: Objection. Calls for a legal	11		MR. LIM: Just put your objection on
12		conclusion.	12		the record. I don't want you to violate the rule.
13		You can answer, if you understand.	13		Just say objection to the form. That's all you need
14		MR. LIM: So, okay, counsel, just	14		to do.
15		objection to the form as the rule requires. I don't	15		MR. ZHU: No, I have an objection.
16		want you to just speak.	16		Asked and answered. If you want, we can call judge
17	A.	Correct.	17		and we can get a clarification of what kind of
18	Q.	Okay. Now, you understand that when	18		objection I can put on the record.
19		you signed it, you had a contractual duty and	19	Q.	So, now, when you signed the pledge
20		obligation to abide by the terms, correct?	20		agreement, it's a one-page document. By the way you
21	A.	Correct.	21		read Korean, right?
22	Q.	Let's go to the next page. Do you	22	A.	Correct.
23		recognize that?	23	Q.	That's in Korean?
24	A.	Yes.	24	A.	Yes.
25	Q.	Do you know what that is?	25	Q.	That's no more than three paragraphs,

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<p>1 right?</p> <p>2 A. Correct.</p> <p>3 Q. Did you read it?</p> <p>4 MR. ZHU: Objection. Asked and</p> <p>5 answered.</p> <p>6 MR. LIM: Sir, hold on. Go off the</p> <p>7 record.</p> <p>8 (Discussion off the record.)</p> <p>9 MR. LIM: Go ahead.</p> <p>10 THE INTERPRETER: What was the last</p> <p>11 question?</p> <p>12 (The record was read.)</p> <p>13 A. Not at the time of signing.</p> <p>14 Q. But did you read it later on?</p> <p>15 A. No, I did not read this particular</p> <p>16 document even after I signed.</p> <p>17 Q. I see. You never read this pledge</p> <p>18 agreement?</p> <p>19 MR. ZHU: Objection. Asked and</p> <p>20 answered.</p> <p>21 A. I'm talking about at the time.</p> <p>22 Q. I see. But when did you read it?</p> <p>23 A. After the lawsuit started with my</p> <p>24 attorney I read it.</p> <p>25 Q. Okay. Let's go to the next exhibit.</p>	<p>1 Do you see that, sir?</p> <p>2 A. Yes.</p> <p>3 Q. Do you see your signature there?</p> <p>4 A. Yes.</p> <p>5 Q. You signed it, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And it was also signed by the minister</p> <p>8 at the time, correct?</p> <p>9 A. Can I explain to you the situations at</p> <p>10 the time of the signing?</p> <p>11 Q. Sir, this is how it works, I'm asking</p> <p>12 you questions. If you want to say something more,</p> <p>13 then later you can always go through your counsel.</p> <p>14 Okay? You are here to answer my questions.</p> <p>15 A. Understood.</p> <p>16 Q. This contract is written in Korean,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. When was the first time you read this?</p> <p>20 A. No, after I signed it, I brought the</p> <p>21 copy with me. Now, I didn't get the copy at the time</p> <p>22 of signing this document. So once I signed it, a few</p> <p>23 days later I got a copy. So when I read the copy, I</p> <p>24 didn't read the entire content, but I read what I</p> <p>25 wanted to read which was how much I was getting paid.</p>
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<p>1</p> <p>2 (REQ) MR. ZHU: For the record, we call for</p> <p>3 production of ROKPM 00010-T through 13-T as well</p> <p>4 certificate of translation.</p> <p>5 (Discussion off the record.)</p> <p>6 (Defendant's Exhibit 2, 2017 papers</p> <p>7 with translation, was marked for</p> <p>8 identification.)</p> <p>9 Q. All right. Now, what's been handed to</p> <p>10 you is Exhibit D-2. I want you to go through that</p> <p>11 and identify it for me.</p> <p>12 A. This is an unfair employment contract</p> <p>13 condition. It's asking me to comply with whatever</p> <p>14 their employment conditions are under the employment</p> <p>15 contract.</p> <p>16 Q. Mr. Nam, I just want you to listen to</p> <p>17 my question carefully. You're not here to give your</p> <p>18 narrative. Just answer my questions. I just asked</p> <p>19 you what is this? Isn't this an employment contract?</p> <p>20 A. Yes.</p> <p>21 Q. That's the one that you're signed in</p> <p>22 2017, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Let's go to the last page of the</p> <p>25 employment contract. You see a date July 1, 2017?</p>	<p>1 Q. Okay. But you had an opportunity to</p> <p>2 read the whole contract?</p> <p>3 MR. ZHU: Objection to the form.</p> <p>4 A. I didn't, not at the time of the</p> <p>5 signing.</p> <p>6 Q. Are you saying that -- by the way, who</p> <p>7 presented this contract to you in 2016 and '17? Just</p> <p>8 the last name, please.</p> <p>9 A. It was Mr. Jo.</p> <p>10 Q. 2016 and 2017 both contracts were</p> <p>11 presented by Mr. Jo?</p> <p>12 A. Based on my recollection, I believe in</p> <p>13 2016 it was Mr. Jo -- so, in 2017 I believe it was</p> <p>14 Mr. Lee. I was mistaken. However -- no, now that he</p> <p>15 know about it, I believe in 2017 it was also Mr. Jo.</p> <p>16 I thought it was between 2016 and 2017 there was a</p> <p>17 personnel change but I was wrong.</p> <p>18 Q. Okay. So let's clarify the record,</p> <p>19 okay. So both contracts, the 2016 and 2017 which we</p> <p>20 just reviewed, were both presented by Mr. Jo to you,</p> <p>21 correct?</p> <p>22 A. Yes, Mr. Jo.</p> <p>23 Q. Okay. Again, these two contracts bear</p> <p>24 your authentic signature, correct?</p> <p>25 A. Correct.</p>

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<p style="text-align: right;">Page 30</p> <p>1 Q. Now, are you saying that in both 2016 2 and '17 after you signed it, you got a copy of both 3 contracts a few days later?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And you were able to retain a 6 copy of the fully executed contracts?</p> <p>7 MR. ZHU: Objection. No question 8 pending. He already answered.</p> <p>9 A. Correct.</p> <p>10 Q. In fact, you did retain the copies of 11 the 2016 and 2017 contract in your possession, 12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. Now, let's go to the pledge agreement 15 Bates stamp No. 19. I see a date July 1, 2017, and 16 did you print your name?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. And it only contains two 19 paragraphs. Did you sign this after you read it?</p> <p>20 A. I didn't.</p> <p>21 Q. You didn't even read it?</p> <p>22 A. Because I was instructed to just sign 23 without reading it.</p> <p>24 Q. Are you saying that Mr. Jo just forced 25 you to sign it?</p>	<p style="text-align: right;">Page 32</p> <p>1 A. Yes.</p> <p>2 Q. And starting from July 1, 2018?</p> <p>3 MR. ZHU: Objection. No question 4 pending.</p> <p>5 Q. Correct?</p> <p>6 A. Yes.</p> <p>7 Q. And ends on June 30, 2019; is that 8 correct?</p> <p>9 A. Yes.</p> <p>10 Q. Now, let's go to the last page of 11 employment contract for chauffeur, Bates stamp No. 12 23. Do you see a date there?</p> <p>13 A. Yes.</p> <p>14 Q. July 1, 2018?</p> <p>15 A. Yes.</p> <p>16 Q. That's your signature, correct?</p> <p>17 A. Well, the contract was presented to me 18 not on July 1st but it was actually presented to me 19 about 20 days later. So in or around July 20th was 20 when I signed the contract.</p> <p>21 Q. I understand. But that's your 22 signature here?</p> <p>23 A. Yes.</p> <p>24 Q. You signed it voluntarily?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 31</p> <p>1 A. Well, I mean, he did not force me, 2 however, typically in order for me to work there, I 3 had to sign a document like this. So when these 4 types of documents are presented to me, I had to 5 sign.</p> <p>6 Q. When you signed 2016-'17 employment 7 contract and pledge agreements, did Mr. Jo ever force 8 you, coerce you, threaten you into signing these 9 documents?</p> <p>10 A. No.</p> <p>11 Q. Let's go to next, Bates stamp No. 20. 12 (Defendant's Exhibit 3, 2018 papers 13 with translation, was marked for 14 identification.)</p> <p>15 Q. Okay. We're going to go through the 16 same drill. Okay? Do you recognize these documents, 17 sir?</p> <p>18 A. Yes.</p> <p>19 Q. This is an employment contract for 20 2018?</p> <p>21 A. Yes.</p> <p>22 MR. ZHU: Objection. No question 23 pending.</p> <p>24 Q. Okay. Now, this is an employment 25 contract also was a one-year term?</p>	<p style="text-align: right;">Page 33</p> <p>1 Q. Okay. Now, are you saying that you got 2 a signed copy of this contract a few days after you 3 had signed it?</p> <p>4 A. Yes.</p> <p>5 Q. You were able to retain it?</p> <p>6 A. Yes.</p> <p>7 Q. You've been keeping it, correct?</p> <p>8 A. Yes.</p> <p>9 Q. Now, it's written in Korean, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. Did you read it at any time?</p> <p>12 A. Well, typically the minister signs it 13 on a later date. So once I received a copy, I read 14 what I wanted to read with regard to the pay and then 15 I kept the document.</p> <p>16 Q. Up until this point did anybody -- 17 strike that.</p> <p>18 When Mr. Jo presented 2016 and 2017 19 contracts, or whoever presented 2018 contract to you, 20 did they not want you to read this contract?</p> <p>21 MR. ZHU: Objection. Foundation.</p> <p>22 A. No.</p> <p>23 Q. Okay. You signed it because you knew 24 that in order to have a job at the Mission, you had 25 to sign this contract, is that what you're saying?</p>

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<p>1 A. Correct.</p> <p>2 Q. Who presented this contract, 2018</p> <p>3 contract to you? Is that Mr. Jo or someone else this</p> <p>4 time?</p> <p>5 A. I believe it was Mr. Lee.</p> <p>6 Q. Okay. Did Mr. Jo and Mr. Lee go over</p> <p>7 every line in the contract before you signed it?</p> <p>8 MR. ZHU: Objection to form.</p> <p>9 A. No.</p> <p>10 Q. Let's go to pledge agreement, Bates</p> <p>11 stamp No. 24. Do you see that, sir?</p> <p>12 A. Yes.</p> <p>13 Q. That's your signature?</p> <p>14 A. Yes.</p> <p>15 Q. Did you sign it at the same time that</p> <p>16 you signed the employment contract for chauffeur?</p> <p>17 A. Well, I can't recall with this</p> <p>18 particular document, however, there were times when</p> <p>19 the two documents were brought together and other</p> <p>20 times they were not.</p> <p>21 Q. So I'm asking you, do you recall</p> <p>22 whether or not you signed this particular document,</p> <p>23 Bates No. 24, at the time that you signed the</p> <p>24 employment contract for chauffeur?</p> <p>25 MR. ZHU: Objection. Asked and</p>	<p>1 A. Yes.</p> <p>2 Q. And I see a date July 1, 2019. Is that</p> <p>3 the date that you signed it?</p> <p>4 A. No.</p> <p>5 Q. When did you sign it?</p> <p>6 THE INTERPRETER: May the interpreter</p> <p>7 ask Mr. Nam to clarify something, please?</p> <p>8 MR. LIM: Sure.</p> <p>9 A. Now, while Mr. Hyun Cho, the investor</p> <p>10 was at the Mission --</p> <p>11 MR. KWAK: The minister.</p> <p>12 A. Now, when Mr. Cho was working at the</p> <p>13 Mission and when Mr. Choi was bringing me this</p> <p>14 documents to sign, he would usually bring them prior</p> <p>15 to the date listed at the last page of the document.</p> <p>16 However, typically if it was other people who brought</p> <p>17 me the documents, it would be either between 10 to 20</p> <p>18 days late.</p> <p>19 Q. Okay. I understand that. Now, let's</p> <p>20 go to -- before that. And this document you signed,</p> <p>21 I'm referring to the document Bates stamp No. 25, it</p> <p>22 appears that this contract began on July 1, 2019,</p> <p>23 though, correct, and it was a one-year term?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. And so far of the contracts that</p>
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<p>1 answered.</p> <p>2 A. I don't remember.</p> <p>3 Q. Okay.</p> <p>4 MR. ZHU: Can you just translate my</p> <p>5 objection as well?</p> <p>6 MR. LIM: She is doing it.</p> <p>7 MR. ZHU: I don't understand Korean.</p> <p>8 MR. LIM: Well, she's doing it. Just</p> <p>9 letting you know.</p> <p>10 Q. Now, let's go through the rest of the</p> <p>11 drill. Let's go to the next employment contract.</p> <p>12 MR. KWAK: Marking it as Exhibit D-4.</p> <p>13 (Defendant's Exhibit 4, 2019 papers and</p> <p>14 translation, was marked for identification.)</p> <p>15 Q. Now, you see this employment contract</p> <p>16 for chauffeur Bates No. 25?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. You've seen this document</p> <p>19 before?</p> <p>20 A. Yes.</p> <p>21 Q. In fact, let's go to the last page of</p> <p>22 the employment contract, Bates stamp No. 29. Is that</p> <p>23 your signature, sir?</p> <p>24 A. Yes.</p> <p>25 Q. You signed it voluntarily?</p>	<p>1 we have reviewed, the employment contract for</p> <p>2 chauffeur has always has a one-year term, correct?</p> <p>3 A. Correct.</p> <p>4 Q. So you signed an employment contract</p> <p>5 every year?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. Now, let's go to a document</p> <p>8 Bates stamp No. 30. The same -- now, can you</p> <p>9 identify that for me?</p> <p>10 A. Pledge agreement.</p> <p>11 Q. This is the same pledge agreement that</p> <p>12 we have seen since 2016; is that correct?</p> <p>13 A. Correct.</p> <p>14 Q. Okay. In fact, you signed this pledge</p> <p>15 agreement every year as well?</p> <p>16 A. Correct.</p> <p>17 Q. And that's your signature, correct?</p> <p>18 A. Yes.</p> <p>19 Q. All right. Now, let's go to next</p> <p>20 employment contract, 31. I'm referring to employment</p> <p>21 contract for chauffeur, Bates stamp No. 31.</p> <p>22 Now, do you recognize this document,</p> <p>23 sir?</p> <p>24 A. Yes.</p> <p>25 Q. It's the same employment contract,</p>

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<p style="text-align: right;">Page 38</p> <p>1 isn't it?</p> <p>2 A. Yes.</p> <p>3 Q. And, in fact, again, this is a one-year</p> <p>4 term, right?</p> <p>5 A. Correct.</p> <p>6 Q. And let's go to Bates stamp No. 35</p> <p>7 which is the last page of the employment contract.</p> <p>8 Do you see your signature there?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Did you sign it on July 1, 2019,</p> <p>11 or some other date?</p> <p>12 A. Some other date.</p> <p>13 Q. Okay. Who presented this document to</p> <p>14 you?</p> <p>15 A. Well, if this is back in 2019, at the</p> <p>16 time there were two secretaries. I don't know which</p> <p>17 one of the two.</p> <p>18 Q. Okay. That's fine. But you signed it</p> <p>19 voluntarily?</p> <p>20 A. Yes.</p> <p>21 Q. Okay. And you were able to retain a</p> <p>22 copy, signed copy of this document; is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. In fact, you've been keeping</p> <p>25 these documents 2016, '17, '18, even '19 since 2016,</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. You were able to retain a fully</p> <p>2 executed copy in your possession?</p> <p>3 A. Yes.</p> <p>4 Q. Okay. Let's go to -- Bates stamp No.</p> <p>5 41. Now, you see the pledge agreement, sir?</p> <p>6 A. Yes.</p> <p>7 Q. This is the same pledge agreement you</p> <p>8 signed every year; is that correct?</p> <p>9 A. Correct.</p> <p>10 Q. This is a document that you also signed</p> <p>11 at the time that you signed the employment contract</p> <p>12 for chauffeur; is that correct?</p> <p>13 A. Yes, probably.</p> <p>14 Q. Okay. That's your signature?</p> <p>15 A. Yes.</p> <p>16 Q. You signed it voluntarily?</p> <p>17 A. Yes.</p> <p>18 Q. Okay. Let's go to the last contract.</p> <p>19 MR. KWAK: D-6.</p> <p>20 (Defendant's Exhibit 6, 2021 papers</p> <p>21 with translation, was marked for</p> <p>22 identification.)</p> <p>23 Q. Okay. Now, I'm referring to the</p> <p>24 document Bates stamped No. 42, employment contract</p> <p>25 for chauffeur.</p>
<p style="text-align: right;">Page 39</p> <p>1 correct?</p> <p>2 A. Correct.</p> <p>3 Q. All right. Now, let's go to Bates</p> <p>4 stamp No. 36 of the employment contract.</p> <p>5 MR. KWAK: That's a new exhibit. D-5.</p> <p>6 (Defendant's Exhibit 5, 2020 papers</p> <p>7 with translation, was marked for</p> <p>8 identification.)</p> <p>9 Q. All right. Okay. Let's go through the</p> <p>10 drill again. This is the same employment contract</p> <p>11 for 2020, is that correct, sir?</p> <p>12 A. Correct.</p> <p>13 Q. And this is a one-year term?</p> <p>14 A. Yes.</p> <p>15 Q. And let's go to the last page of the</p> <p>16 employment contract. That's your signature, sir?</p> <p>17 A. Yes.</p> <p>18 Q. This time, let's see, was it also</p> <p>19 signed on July 1, 2020?</p> <p>20 A. No, at the time there was a change of</p> <p>21 ministers and Mr. Jo came into the picture, and I</p> <p>22 believe I signed this document in or around October</p> <p>23 of this year.</p> <p>24 Q. Okay. But you signed it voluntarily?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 41</p> <p>1 A. Yes.</p> <p>2 Q. This is the same employment contract</p> <p>3 that you signed every year or substantially similar,</p> <p>4 correct?</p> <p>5 A. Correct.</p> <p>6 Q. And it is a one-year term?</p> <p>7 A. It depends on when I received the</p> <p>8 contract because at that time instead of a one-year</p> <p>9 contract, there was a change in the minister and he</p> <p>10 was late arriving. However, I received initially</p> <p>11 one-year contract and then I received a revised</p> <p>12 version afterward.</p> <p>13 Q. Okay. We'll find out. Now, let's go</p> <p>14 to the last page of the contract, referring to Bates</p> <p>15 stamp No. 46. You see your signature there, correct?</p> <p>16 A. Yes.</p> <p>17 Q. You signed it voluntarily?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. It's written in Korean?</p> <p>20 A. Yes.</p> <p>21 Q. Now, let's go to the next page what</p> <p>22 appears to be a pledge agreement.</p> <p>23 A. Okay.</p> <p>24 Q. You see that, sir?</p> <p>25 A. Yes.</p>

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<p>1 Q. You signed it?</p> <p>2 A. Yes.</p> <p>3 Q. And at the same time that you signed</p> <p>4 the employment contract for chauffeur in 2021, you</p> <p>5 signed it?</p> <p>6 A. Well, based on as far as I can</p> <p>7 remember, they were probably signed at the same time</p> <p>8 even though I only received one pledge agreement,</p> <p>9 whereas, I received two different employment</p> <p>10 contracts.</p> <p>11 Q. Okay. So now, so let's clarify for the</p> <p>12 record because we went through some documents here.</p> <p>13 It's safe to say that since 2016 you began to work at</p> <p>14 the Mission, every year you signed an employment</p> <p>15 contract as well as a pledge agreement; is that</p> <p>16 correct, sir?</p> <p>17 A. Correct.</p> <p>18 Q. Every contract is a one-year term?</p> <p>19 A. Yes.</p> <p>20 Q. And you were able to retain a fully</p> <p>21 executed copy of every document you signed?</p> <p>22 A. Yes.</p> <p>23 Q. And every document is written in</p> <p>24 Korean?</p> <p>25 A. Yes.</p>	<p>1 A. This language was included in a</p> <p>2 document that I was shown at the time of my hiring.</p> <p>3 Q. Okay. So do you now -- does that</p> <p>4 refresh your recollection?</p> <p>5 A. Yes.</p> <p>6 Q. Does that refresh your recollection as</p> <p>7 to whether you signed a form that authorized the</p> <p>8 Mission to conduct a background check on you?</p> <p>9 A. Well, I mean, that form was included</p> <p>10 with the other document that I needed to sign at the</p> <p>11 time of my hiring, so I would have to say yes, I</p> <p>12 signed it.</p> <p>13 Q. Okay. Now, were you aware or are you</p> <p>14 aware today that the Mission had to conduct a</p> <p>15 background check on you, once in the United States</p> <p>16 and once in Korea by the South Korean government in</p> <p>17 order for you to work at the Mission?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. In fact, they did conduct a</p> <p>20 background check on you. You passed the security</p> <p>21 clearance, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Now, your job at the Mission was to</p> <p>24 drive for the ministers that had been working at the</p> <p>25 Mission, correct?</p>
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<p>1 Q. If you wanted to, you could always read</p> <p>2 it at any time?</p> <p>3 A. Correct.</p> <p>4 Q. Okay.</p> <p>5 MR. ZHU: Just, again, I instruct my</p> <p>6 client, wait for the question.</p> <p>7 Q. Okay. Now, after you signed this</p> <p>8 pledge agreements and employment contracts, did you</p> <p>9 at any point tell anyone, especially the ministers</p> <p>10 you were working for, that this is a wrong contract,</p> <p>11 unfair contract and I don't want to sign? Did you</p> <p>12 tell any minister?</p> <p>13 A. No.</p> <p>14 Q. Now, and at the time you began to work</p> <p>15 at the Mission on July 1, 2016, do you recall you had</p> <p>16 to sign documents authorizing the Mission to conduct</p> <p>17 a background check on you for security clearance?</p> <p>18 A. I can't recall.</p> <p>19 MR. LIM: Mark this.</p> <p>20 (Defendant's Exhibit 7, consent form,</p> <p>21 was marked for identification.)</p> <p>22 Q. Now, I'm now presenting to you the</p> <p>23 consent form that you actually signed, but I'm</p> <p>24 presenting to you language that the consent form had.</p> <p>25 It's in Korean. I want you to read it.</p>	<p>1 A. Yes.</p> <p>2 Q. Not the ambassador, right?</p> <p>3 A. Correct.</p> <p>4 Q. Not any other just employee but the</p> <p>5 ministers, correct?</p> <p>6 A. Now, no, because initially when Mr. Ko</p> <p>7 explained my work for me, he told me that the vehicle</p> <p>8 that I was driving was an official car. So anyone</p> <p>9 who was -- who had an official duty at the Mission</p> <p>10 was able to utilize that car and even myself, if I</p> <p>11 had an official duty, I could use that car.</p> <p>12 Q. I understand. Hold on, there is no</p> <p>13 question pending. There is no question pending. I'm</p> <p>14 asking you. Don't worry, we'll get there.</p> <p>15 So, you were the designated driver for</p> <p>16 the ministers, correct?</p> <p>17 A. No, I was not.</p> <p>18 Q. Are you saying that there was someone</p> <p>19 else designated for the ministers?</p> <p>20 A. No.</p> <p>21 Q. So that's my question. I want you to</p> <p>22 listen to me very carefully. According to this</p> <p>23 contract that you signed, your primary duty was to</p> <p>24 drive for the ministers, correct?</p> <p>25 MR. ZHU: Objection. Document speaks</p>

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<p style="text-align: right;">Page 46</p> <p>1 for itself.</p> <p>2 A. However, even though the contract may</p> <p>3 say that, what Mr. Ko told me that he was a</p> <p>4 (redacted) public servant and as a (redacted) public</p> <p>5 servant he was not allowed to hire a personal driver.</p> <p>6 Q. Sir, my question is this: There was a</p> <p>7 designated driver for the ambassadors, correct?</p> <p>8 A. Correct.</p> <p>9 Q. There was a designated driver for the</p> <p>10 ministers, correct?</p> <p>11 MR. ZHU: Objection. Asked and</p> <p>12 answered.</p> <p>13 A. Not for the ministers.</p> <p>14 Q. There was no designated driver for the</p> <p>15 ministers at any time?</p> <p>16 MR. ZHU: Asked and answered.</p> <p>17 A. Because I was told the (redacted) or</p> <p>18 (redacted) officials would not get a designated</p> <p>19 driver.</p> <p>20 Q. At the time you worked at the Mission,</p> <p>21 you had an office and you shared that office with</p> <p>22 someone who did research, correct?</p> <p>23 A. Well, it wasn't my office. It was a</p> <p>24 waiting room for a chauffeur.</p> <p>25 Q. I understand. You waited at the</p>	<p style="text-align: right;">Page 48</p> <p>1 MR. ZHU: Objection.</p> <p>2 Q. Any other driver.</p> <p>3 A. No.</p> <p>4 Q. Excuse me, hold it. There is no</p> <p>5 question pending.</p> <p>6 Now, we're going to go through the</p> <p>7 contract and pledge agreements. Okay? Let's go to</p> <p>8 2016 contract.</p> <p>9 A. Could I correct my answer?</p> <p>10 Q. No, we're going to go back later.</p> <p>11 2016. Now, let's go to paragraph 2,</p> <p>12 No. 4.</p> <p>13 Before that, if you look at paragraph</p> <p>14 1, you see the name of the minister that you worked</p> <p>15 for, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And let's go to paragraph 2, No.</p> <p>18 4. Can you read it to yourself?</p> <p>19 A. Yes, I'm done.</p> <p>20 Q. Okay. According to this contract, you</p> <p>21 are not allowed to engage in activities that give you</p> <p>22 financial benefit unless you first obtain permission</p> <p>23 from the Mission; is that correct?</p> <p>24 A. Correct.</p> <p>25 Q. Okay. And, in fact, did you work for</p>
<p style="text-align: right;">Page 47</p> <p>1 office?</p> <p>2 A. Yes.</p> <p>3 MR. ZHU: Objection. Mischaracterize.</p> <p>4 MR. LIM: Okay. Excuse me. Excuse me.</p> <p>5 Okay, it's my deposition. Okay.</p> <p>6 Q. Did you have a designated car at the</p> <p>7 time you worked at the Mission?</p> <p>8 A. Yes, the official car.</p> <p>9 Q. What's the model and the type, the</p> <p>10 make?</p> <p>11 MR. ZHU: Objection. Compound.</p> <p>12 A. 2015 Genesis.</p> <p>13 Q. Did you drive the car at all times?</p> <p>14 A. Yes.</p> <p>15 Q. Did anyone else drive that car besides</p> <p>16 you?</p> <p>17 A. No.</p> <p>18 Q. Only you drove that car?</p> <p>19 A. So, since that was the only car, if I</p> <p>20 get a request to drive somebody, then that was the</p> <p>21 car that I used.</p> <p>22 Q. That was the official car provided by</p> <p>23 the Mission?</p> <p>24 A. Correct.</p> <p>25 Q. Now, did anyone else drive that car?</p>	<p style="text-align: right;">Page 49</p> <p>1 anyone else that gave you financial benefit while</p> <p>2 working at the Mission without permission from the</p> <p>3 Mission?</p> <p>4 A. No.</p> <p>5 Q. Okay. Let's go to the next paragraph,</p> <p>6 No. 5. According to this contract you're not</p> <p>7 supposed to engage in any act that's contrary to the</p> <p>8 national interests of South Korea; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Did you do anything that's contrary to</p> <p>11 the national interests of South Korea?</p> <p>12 A. No.</p> <p>13 Q. At any time?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. Now, let's go to No. 6.</p> <p>16 According to this term you will be penalized</p> <p>17 according to South Korean laws if you ever divulge</p> <p>18 information that you learned or acquired during the</p> <p>19 course of your employment.</p> <p>20 MR. ZHU: Objection. No question</p> <p>21 pending.</p> <p>22 A. Correct.</p> <p>23 Q. Did you do anything that violates this</p> <p>24 term?</p> <p>25 A. Other than the personal information</p>

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<p style="text-align: right;">Page 50</p> <p>1 relating to A, minister's family, I have never 2 divulged any official information related to the 3 Mission. 4 Q. In fact, during the course of 5 employment at the Mission you're not allowed to tell 6 anyone where the ministers went, who the ministers 7 met and what they discussed in the car or outside of 8 the car, correct? 9 A. Correct. 10 Q. In fact, are you telling me that you 11 did not tell anyone about that to this day? 12 A. Correct. 13 Q. Okay. Now, corresponding to this 14 contract, paragraph 4, your working hours are from 9 15 to 6 p.m., is that right? 9 a.m. to 6 p.m., correct? 16 A. Yes. 17 Q. In case you had to work beyond these 18 working hours, you had to report to the Mission, 19 correct? 20 A. I never -- I was never told to report 21 it to the Mission. 22 Q. Were you ever -- did you ever report 23 the extra hours you worked beyond these designated 24 working hours? 25 A. No, I was never told that I could -- I</p>	<p style="text-align: right;">Page 52</p> <p>1 instructing you don't give me a narrative, just 2 answer my questions. 3 MR. ZHU: I object to this 4 unfortunately on the record. 5 MR. LIM: Can you read back my 6 question? 7 You know what, let me just keep it 8 simple. I'll show him the exhibit. This is simple. 9 You need to mark it. 10 (Defendant's Exhibit 8, time records, 11 were marked for identification.) 12 Q. Okay. Now, I want to show you been 13 marked as D-8. Have you seen this document? 14 A. Yes. 15 Q. Okay. Can you tell me what that is? 16 A. It is the record of my overtime work 17 hours. 18 Q. Okay. So this is exactly what I meant 19 by that earlier when I asked you did you ever work 20 beyond the designated working hours from 9 a.m. to 6 21 p.m. You said yes, correct? 22 A. Yes. 23 Q. And, in fact, each time you worked 24 beyond the designated working hours, the overtime you 25 were able to write down the hours you worked, the</p>
<p style="text-align: right;">Page 51</p> <p>1 should record the extra hours I worked to the 2 Mission, had I been explained this or had I been 3 instructed to do so, I may have, however, I only 4 followed the instructions that I was given and I only 5 executed the -- executed my duties that I was 6 supposed to do. 7 Q. Are you telling me that there wasn't 8 any occasion when you worked beyond these designated 9 working hours? 10 A. No, there were many occasions. 11 Q. I understand that. So in those cases 12 when you worked more than these designated hours, did 13 you report to the Mission to get overtime? 14 MR. ZHU: Objection. Asked and 15 answered. 16 (Witness answering in Korean not yet 17 translated.) 18 MR. LIM: Excuse me. No, we're going 19 to go off the record because he's about to do -- he's 20 about to breach the confidentiality, that's why. 21 Go off the record. 22 (Discussion off the record.) 23 MR. LIM: We're going to go back. 24 BY MR. LIM: 25 Q. Now, Mr. Nam, again, on the record I'm</p>	<p style="text-align: right;">Page 53</p> <p>1 extra hours you worked, correct? 2 A. Correct. 3 Q. Okay. And you were paid for those 4 extra hours, overtime hours according to the contract 5 that's indicated here; is that correct? 6 A. Not all of it. 7 Q. Okay. We'll get there. Okay. But 8 now, when you wrote down these hours, these hours are 9 based on your records; is that correct? 10 A. Well, basically I entered the 11 information based on the note that I had, however, 12 once this document was submitted, the secretaries 13 adjusted the hours according to the contract. 14 Q. Okay. Can you show me one example that 15 your work hours were adjusted? 16 A. Now, the secretaries would not touch 17 the information, it was always the ministers. So, 18 for instance, I actually wanted to add my lunch hour 19 which was one hour into the payable hour, however, 20 the ministers felt that because I was not working but 21 waiting, that's considered a wait time, so they 22 refused to include that as my work hour. 23 Q. Okay. So now show me other than the 24 lunch hour, show me the hours that were adjusted by 25 the Mission.</p>

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<p style="text-align: right;">Page 54</p> <p>1 A. Well, so Mr. Ko and Mr. Han was never 2 involved in adjusting the hours. It was just 3 Mr. Lee, Jungjae Lee. 4 Q. Show me the records that were adjusted 5 by Lee. 6 MR. ZHU: Is there a question? 7 MR. LIM: I asked him. 8 A. I wouldn't be able to tell you just 9 using this record. I would have to use my own record 10 and compare it with this record. 11 Q. Okay. Other than Lee, did anyone else 12 adjust your work hours? 13 A. No. 14 Q. Okay. Now, do you have notes that 15 would show the discrepancy, the alleged discrepancy 16 between what you reported and the actual hours you 17 worked? 18 A. Yes. 19 Q. Okay. Do you have it now with you? 20 A. My attorney has it. 21 MR. LIM: Did counsel produce that? 22 MR. BAE: Yes. 23 MR. LIM: Are you referring to the 24 memos? 25 MR. KWAK: The notepads, right, Yellow</p>	<p style="text-align: right;">Page 56</p> <p>1 A. No. 2 Q. So you just got cash? 3 A. No, I wanted to be paid in checks so I 4 could report my earnings on taxes. 5 Q. Okay. Now, let's go to pledge 6 agreement, Bates No. 14. 7 MR. LIM: After this we're going to 8 take a short break. Okay? 9 MR. ZHU: Yes. 10 Q. Now, pledge agreement, this is the same 11 form that you signed every year for five years; is 12 that correct? 13 A. Yes. 14 Q. According to paragraph 1 -- strike 15 that. 16 Before that, if you look at the 17 preamble, it says you solemnly swear to abide by the 18 following terms, is that correct? 19 A. Yes. 20 Q. And would you say that you had -- 21 strike that. 22 Have you ever engaged in any act that 23 breaches this pledge agreement? 24 A. No. 25 Q. Okay. Let's go over two paragraphs,</p>
<p style="text-align: right;">Page 55</p> <p>1 Pages? 2 MR. BAE: Yes. 3 BY MR. LIM: 4 Q. So you're saying that you're not able 5 to include one hour lunch and Mr. Lee allegedly 6 adjusted your work hours? 7 A. Yes. 8 Q. Just one hour lunch or more than that? 9 A. It's more than that. 10 Q. Okay. All right. We'll get there, 11 okay? We'll come back to this. 12 MR. ZHU: Counsel, can we have a short 13 break? 14 MR. LIM: Hold on. I'm almost done 15 with the contract. 16 Q. Let's come back to 2016 contract. Now, 17 let's go to paragraph 5, No. 6. According to this 18 contract, you understand that the Mission is exempt 19 from paying payroll tax, such as Social Security and 20 et cetera; is that correct? 21 A. Yes. 22 Q. In fact, you got paid in cash, correct? 23 A. Yes. 24 Q. In fact, you told them that you would 25 prefer cash?</p>	<p style="text-align: right;">Page 57</p> <p>1 okay? Paragraph 1, it says, any information that you 2 may acquire during the course of your employment 3 while driving the official vehicle for the Mission, 4 you will not divulge any classified information, any 5 secret, even after you are no longer employed by the 6 Mission, correct? 7 A. Correct. 8 Q. Okay. Have you divulged, disclosed, 9 told anyone the information, the classified 10 information that you acquired during the course of 11 your employment? 12 A. No, except for the ones who are 13 involved in this lawsuit, the defendants. 14 Q. Okay. You understand that this pledge 15 agreement is incredibly critically important to you 16 performing your job; is that correct? Yes? 17 A. Correct. 18 Q. In fact, you were reminded repeatedly 19 by the people at the Mission how important it is for 20 you to keep the information you learned top secret, 21 correct? 22 MR. ZHU: Objection to form. Time 23 frame. 24 Q. I'm referring to 2016 pledge agreement. 25 Yes or no, have you done anything? Strike that.</p>

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<p style="text-align: right;">Page 58</p> <p>1 My question is this: Again, let's go</p> <p>2 to paragraph 2. Let's go to paragraph 2. And</p> <p>3 according to this paragraph 2, you said you are</p> <p>4 willing to bear any punishment in case you breached</p> <p>5 this pledge agreement, correct?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. In fact, you would be</p> <p>8 responsible for any and all financial liabilities as</p> <p>9 well, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. So you're testifying as you sit</p> <p>12 here today you have never done anything that breached</p> <p>13 this pledge agreement, correct?</p> <p>14 MR. ZHU: Objection. Asked and</p> <p>15 answered.</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. We're going to take a</p> <p>18 five-minute break. We to come back and I'm advising</p> <p>19 you once been you cannot talk to counsel about your</p> <p>20 prior testimony. We'll come back and go through the</p> <p>21 rest.</p> <p>22 (Discussion held off the record.)</p> <p>23 (Luncheon recess taken.)</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 60</p> <p>1 MR. ZHU: Objection to the form. I'll</p> <p>2 object to the previous question which was already</p> <p>3 answered.</p> <p>4 MR. LIM: Okay.</p> <p>5 Q. Now, I want to direct your attention to</p> <p>6 No. 4, under paragraph 2, again, which is on Bates</p> <p>7 stamped No. 15. The same term as the 2016, that is</p> <p>8 you're not supposed to engage in activities that will</p> <p>9 give you financial benefit other than the job that</p> <p>10 you're supposed to perform for the Mission unless you</p> <p>11 first get advanced permission from the Mission,</p> <p>12 correct?</p> <p>13 A. Correct.</p> <p>14 Q. So you're testifying as you sit here</p> <p>15 today that you did not engage in any activities that</p> <p>16 violate, that breach this term; is that correct?</p> <p>17 A. Correct.</p> <p>18 Q. Now, let's go to page 16, No. 5 under</p> <p>19 paragraph 2. It's the same term as in 2016, you're</p> <p>20 not supposed to do anything that's contrary to the</p> <p>21 national interests of South Korea; is that correct?</p> <p>22 A. Correct.</p> <p>23 Q. Have you done anything that would</p> <p>24 breach or that breached this term?</p> <p>25 A. No.</p>
<p style="text-align: right;">Page 59</p> <p>1 AFTERNOON SESSION</p> <p>2 12:38 p.m.</p> <p>3 HYUNHUY NAM, having been previously duly sworn by a</p> <p>4 Notary Public, was examined and testified further as</p> <p>5 follows:</p> <p>6 MR. LIM: My colleague and I, we</p> <p>7 discussed certain terms to be redacted, and based</p> <p>8 that on stipulation certain terms will be stricken</p> <p>9 and redacted. And thank you so much for your</p> <p>10 courtesy. I appreciate that.</p> <p>11 EXAMINATION Continued</p> <p>12 BY MR. LIM:</p> <p>13 Q. And, again, Mr. Nam, going forward, I</p> <p>14 want you to be mindful of the pledge agreement that</p> <p>15 you signed. Okay?</p> <p>16 (Discussion off the record.)</p> <p>17 Q. So, we just finished reviewing 2016</p> <p>18 agreements. Now we're going to go through 2017.</p> <p>19 Now, 2017, if you look at the first page which is</p> <p>20 Bates stamped No. 15, the content is almost identical</p> <p>21 as the 2016 document, correct?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Your work hours, correct?</p> <p>24 A. Correct.</p> <p>25 Q. Now --</p>	<p style="text-align: right;">Page 61</p> <p>1 Q. Let's go to No. 6. Again, the same</p> <p>2 term as in 2016, correct?</p> <p>3 A. Correct.</p> <p>4 Q. And you're not supposed to divulge any</p> <p>5 information that you learned or acquired during the</p> <p>6 course of your employment to anyone because this is a</p> <p>7 secret, correct?</p> <p>8 A. Correct.</p> <p>9 Q. And classified information, correct?</p> <p>10 A. Correct.</p> <p>11 Q. And, in fact, if you do, it says you'll</p> <p>12 be penalized according to South Korean laws; is that</p> <p>13 right?</p> <p>14 A. Correct.</p> <p>15 Q. Are you saying that you have never done</p> <p>16 anything that violates this term?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. Let's go to paragraph 5, No. 6.</p> <p>19 The same term as in 2016, it reminds you that the</p> <p>20 Mission is exempt from paying any payroll tax</p> <p>21 including Social Security, correct?</p> <p>22 A. Correct.</p> <p>23 Q. And you got paid in cash, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Now, let's go -- I want to direct your</p>

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<p>1 attention to No. 7, under paragraph 7. Okay. Isn't</p> <p>2 it true that paragraph 7 lists seven categories which</p> <p>3 may give a ground for termination?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. And if you look at paragraph</p> <p>6 5 -- I'm sorry, not paragraph 5, No. 5, there are</p> <p>7 four categories that the Mission would review to</p> <p>8 determine whether or not your performance is</p> <p>9 satisfactory, correct?</p> <p>10 A. Correct.</p> <p>11 Q. Number one was diligence, correct?</p> <p>12 A. Yes.</p> <p>13 Q. Number two, responsibility, correct?</p> <p>14 A. Yes.</p> <p>15 Q. Number three, the ability to perform</p> <p>16 your job, correct?</p> <p>17 A. Correct.</p> <p>18 Q. Number four, your ability to keep</p> <p>19 matters secret, top secret, correct?</p> <p>20 A. Correct.</p> <p>21 Q. And would you say that you performed</p> <p>22 your duties and responsibilities in a way that</p> <p>23 satisfied these conditions?</p> <p>24 A. Yes.</p> <p>25 Q. Okay. Now, let's go to No. 7 under</p>	<p>1 that you signed in 2017 is exactly identical as the</p> <p>2 one that you signed in 2016, correct?</p> <p>3 A. Yes.</p> <p>4 Q. And did you do anything that breached</p> <p>5 this pledge agreement at any time?</p> <p>6 A. No.</p> <p>7 Q. And, in fact, according to this pledge</p> <p>8 agreement, it says any and all information you</p> <p>9 acquired is significant and critical, top secret,</p> <p>10 correct?</p> <p>11 A. But I have a question.</p> <p>12 Q. No, you cannot ask questions.</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Next, let's go to page 20. It's</p> <p>15 Bates stamped No. 20.</p> <p>16 THE INTERPRETER: There is no Bates</p> <p>17 stamp No. 20.</p> <p>18 MR. KWAK: That's a different exhibit.</p> <p>19 MR. ZHU: Can the witness have a copy?</p> <p>20 MR. LIM: Yes.</p> <p>21 MR. ZHU: For the record we're talking</p> <p>22 about D-3.</p> <p>23 MR. KWAK: Okay, D-3. Yes.</p> <p>24 MR. LIM: Thank you.</p> <p>25 BY MR. LIM:</p>
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<p>1 paragraph 7. No. 7, it says one of the grounds for</p> <p>2 termination is that if you did not keep security</p> <p>3 guidelines, that you could be terminated, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Did you keep all the security</p> <p>6 guidelines?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. Let's go to 18. I want to</p> <p>9 direct your attention to paragraph 9 on the document</p> <p>10 Bates stamped No. 18. There it says the Mission</p> <p>11 could permit your vacation days at its discretion</p> <p>12 subject to compliance with the Republic of Korea</p> <p>13 Diplomatic Offices Executive Employees Guidelines,</p> <p>14 correct?</p> <p>15 A. Yes.</p> <p>16 Q. And the provision concerning executive</p> <p>17 employees vacation days in the Mission's policies,</p> <p>18 correct?</p> <p>19 A. Correct.</p> <p>20 Q. Did you receive some vacation days in</p> <p>21 2017?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Let's go to page 19 -- I'm</p> <p>24 sorry, not page 19, Bates No. 19, the pledge</p> <p>25 agreement. You recognize that this pledge agreement</p>	<p>1 Q. All right. This is a contract that you</p> <p>2 signed in 2018, correct?</p> <p>3 A. Correct.</p> <p>4 Q. This is another employment contract for</p> <p>5 chauffeur, correct?</p> <p>6 A. Correct.</p> <p>7 Q. And, in fact, the terms are identical</p> <p>8 as 2016 and '17 employment contract; is that correct?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. Now, again, let me ask you this:</p> <p>11 Paragraph 2, No. 5, in 2018 did you do anything</p> <p>12 that's contrary to the national interests of South</p> <p>13 Korea?</p> <p>14 A. So, I mean, this is an umbrella</p> <p>15 question. So what exactly are you trying to ask?</p> <p>16 Q. Okay. My question is this: Let's go</p> <p>17 to 6. We're going combine 5 and 6 together. Did you</p> <p>18 divulge any information you learned to anyone that's</p> <p>19 not authorized to receive that information?</p> <p>20 MR. ZHU: Objection to the form. Time</p> <p>21 frame.</p> <p>22 A. I mean, could you specify the time</p> <p>23 frame, please because the question is too broad?</p> <p>24 Q. I am going over 2019.</p> <p>25 A. So could you be more specific with your</p>

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<p>1 questions, please because with regard to this person</p> <p>2 who is involved in during this year, there is a lot</p> <p>3 of --</p> <p>4 Q. Sure. Sure.</p> <p>5 A. -- stories or issues.</p> <p>6 Q. And did you tell anyone who the</p> <p>7 minister met, what the minister did and where the</p> <p>8 minister went and what he discussed to anyone that is</p> <p>9 not authorized to know?</p> <p>10 MR. ZHU: Objection to the form.</p> <p>11 You can answer if you understand.</p> <p>12 Q. Yes or no?</p> <p>13 A. Could you be more specific, please?</p> <p>14 Q. I cannot be more specific than this.</p> <p>15 I'm asking you again. I'll just repeat the question.</p> <p>16 Did you tell anyone that is not authorized to know</p> <p>17 concerning where the minister went, who the minister</p> <p>18 met, what the minister did and what the minister</p> <p>19 discussed, yes or no?</p> <p>20 MR. ZHU: Objection to the form.</p> <p>21 Q. Yes or no?</p> <p>22 MR. ZHU: You can answer if you</p> <p>23 understand.</p> <p>24 Q. If you didn't, you didn't. If you did,</p> <p>25 tell me when.</p>	<p>1 A. Could you be more specific?</p> <p>2 Q. No. Look, I'm asking you. If you</p> <p>3 know, you know. If you don't know, you don't know.</p> <p>4 Did you do anything that violated this term?</p> <p>5 MR. ZHU: Instruction to my client, if</p> <p>6 don't understand the question, let us know, ask</p> <p>7 defense counsel to rephrase or repeat it for you.</p> <p>8 A. I mean, unless you ask me specific</p> <p>9 questions, it would be difficult for me to answer</p> <p>10 that question because this contract is very broad.</p> <p>11 Q. Okay. Let me ask you this: Mr. Nam,</p> <p>12 do you believe, do you believe that you engaged in</p> <p>13 any act that would violate this particular term,</p> <p>14 paragraph 7, No. 5, or --</p> <p>15 MR. ZHU: I'll object.</p> <p>16 MR. LIM: Excuse me.</p> <p>17 MR. ZHU: Objection. Calls for legal</p> <p>18 conclusion.</p> <p>19 A. Particularly what do you mean?</p> <p>20 Q. Let me ask you -- let's go to paragraph</p> <p>21 7. I'm going to come back to 5. I want to go over 7</p> <p>22 first.</p> <p>23 Did you ever divulge, disclose</p> <p>24 information that you learned during the course of</p> <p>25 employment in 2018 to anyone that is not authorized</p>
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<p>1 A. I choose not to answer.</p> <p>2 Q. You have to answer my questions.</p> <p>3 A. I do not know.</p> <p>4 Q. You understand that if you violated</p> <p>5 this term, you could be punished according to South</p> <p>6 Korean laws, correct?</p> <p>7 MR. ZHU: Objection. Asked and</p> <p>8 answered.</p> <p>9 A. I do understand.</p> <p>10 Q. Okay. Now, we're going to skip, going</p> <p>11 to go through some questions quickly. Go to Bates</p> <p>12 stamped 22, some questions I don't want to repeat, so</p> <p>13 I'll just ask him comprehensive questions.</p> <p>14 Isn't it true that during the course of</p> <p>15 employment at the Mission, the Mission was exempt</p> <p>16 from paying any payroll tax including Social</p> <p>17 Security, correct?</p> <p>18 MR. ZHU: Objection. Foundation.</p> <p>19 A. Correct.</p> <p>20 Q. Okay. Now, page -- no, paragraph 7,</p> <p>21 No. 5 and 7. Again, you were aware your performance</p> <p>22 will be reviewed based on four categories, your</p> <p>23 diligence, responsibility, your ability to perform</p> <p>24 your job and your ability to keep information secret.</p> <p>25 Now, did you do anything that violated this?</p>	<p>1 to know concerning what the minister did, where the</p> <p>2 minister went, what the minister discussed, who the</p> <p>3 minister met?</p> <p>4 MR. ZHU: Objection to the form.</p> <p>5 You can answer if you understand it.</p> <p>6 A. I mean, first of all, it's too broad.</p> <p>7 There has been too many things that occurred and</p> <p>8 there are many issues. So if you can be more</p> <p>9 specific, I may be able to answer your questions.</p> <p>10 Q. If you continue to refuse to answer,</p> <p>11 we're going to call the judge and we're going to have</p> <p>12 the judge direct you to answer my question. Okay?</p> <p>13 I'm going to give you one more chance.</p> <p>14 MR. ZHU: That is his answer.</p> <p>15 MR. LIM: Excuse me, please.</p> <p>16 Q. I'm going to ask you this question --</p> <p>17 MR. ZHU: He already answered. That's</p> <p>18 harassment.</p> <p>19 MR. LIM: It's not harassment.</p> <p>20 MR. ZHU: That's harassment.</p> <p>21 MR. LIM: Please, put an objection on</p> <p>22 the record. Just stop.</p> <p>23 Q. Do you believe, do you believe --</p> <p>24 okay --</p> <p>25 MR. ZHU: Objection --</p>

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<p>1 MR. LIM: Excuse me. I understand you 2 can put an objection on the record. 3 Q. Now let me -- 4 MR. ZHU: He already answered. 5 MR. LIM: Excuse me. 6 Q. Do you believe -- 7 MR. ZHU: Asked and answered. 8 MR. KWAK: He did not answer. He said 9 he cannot answer because it's broad. 10 MR. ZHU: That's the answer. 11 MR. KWAK: He specifically refused to 12 answer. Stop. 13 MR. ZHU: Let's get a judge. I 14 instruct my client not going forward -- 15 MR. LIM: You know what, let's call the 16 judge. 17 MR. ZHU: That's the answer. Maybe 18 it's something you don't want, but that's the answer. 19 MR. KWAK: He specifically refused to 20 answer. 21 (Discussion off the record.) 22 (Call placed to Judge Nathan.) 23 MR. LIM: So I just want to put it on 24 the record, I'll ask you and let me know what your 25 answer is so that we can use that as a basis to speak</p>	<p>1 A. With regard to the violation of that 2 particular term, that was already discussed with my 3 attorney and I notified them of what that violation 4 was. 5 Q. I don't want you to tell me what you 6 discussed with your counsel. I'm not entitled to 7 know. I'm not interested in knowing. 8 Tell me the violations that you have 9 committed according to your belief. 10 A. Because in the past I was never 11 instructed with a clear line as to what I should do 12 and what I should not do and therefore I was not sure 13 or I'm not sure what I have violated. 14 Q. Mr. Nam, you're under oath. You 15 testified earlier that you clearly knew what the 16 minister did, who the minister met, what the minister 17 discussed was top secret and you said you never 18 divulged it to anyone. Now, let me ask you this 19 again, are you lying now or did you lie before? 20 A. In 2016 and 2017 I complied with the 21 requirement -- with the conditions of the contracts. 22 Q. But in 2018 you did not? 23 A. No. 24 Q. Didn't I just show you the 2018 25 contract is identical as 2016 and 2017 contracts?</p>
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<p>1 to the judge about it. Okay? 2 MR. ZHU: You can move on. 3 MR. LIM: No, I'm going to put it on 4 the record so that -- look, this is the witness's 5 answer so that we can tell the judge this what we 6 have, let us know whether or not we can ask more. 7 MR. KWAK: Can you just read back the 8 last question. 9 (The record was read as follows: 10 "QUESTION: Did you ever divulge, disclose 11 information that you learned during the 12 course of employment in 2018 to anyone that 13 is not authorized to know concerning what the 14 minister did, where the minister went, what 15 the minister discussed, who the minister met? 16 Q. Your answer? 17 A. It's difficult for me to answer it 18 because there are a lot of personal matters that 19 occurred. And with regard to the duties that I 20 performed, I don't know if all of them were official 21 or personal. It's difficult to decipher those two. 22 Q. Okay. Do you believe that you have 23 violated this term? 24 MR. ZHU: Objection to the form. Calls 25 for a legal conclusion.</p>	<p>1 Now, let me ask you, did you violate the terms of 2 this contract in 2018 or do you believe? If you 3 don't believe, that's fine, we're moving on. 4 A. Well, I don't believe I violated any 5 conditions. 6 Q. Okay. So, let's go to 2019. This is, 7 in fact, the same contract as 2016, '17 and '18, 8 correct? 9 A. Correct. 10 Q. Okay. Now, isn't it true that if you 11 look at the document Bates No. 28, No. 8 and 9, how 12 you will be evaluated, there are four categories, 13 right, diligence, responsibility, your ability to 14 perform your job, your ability to keep information 15 top secret, right? 16 A. Correct. 17 Q. And, in fact, these terms appear in 18 every contract, correct? 19 A. Yes. 20 Q. In fact, the next one, No. 9, you could 21 be terminated for not keeping the information, 22 classified information secret, that could be a ground 23 for termination, correct? 24 A. Yes. 25 Q. In fact, this requirement appears in</p>

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<p style="text-align: right;">Page 74</p> <p>1 every contract, right?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. Let's go to pledge agreement,</p> <p>4 Bates stamp No. 30. Now, I want to direct your</p> <p>5 attention to paragraph 3 of this pledge agreement.</p> <p>6 There it says if the Mission requires, you will</p> <p>7 submit yourself voluntarily to the polygraph test</p> <p>8 concerning whether or not you violated your duties</p> <p>9 and responsibilities concerning keeping information</p> <p>10 secret, correct?</p> <p>11 A. Correct.</p> <p>12 Q. Have you ever submitted yourself to a</p> <p>13 polygraph test?</p> <p>14 A. No.</p> <p>15 Q. Has ever anyone requested a polygraph</p> <p>16 test?</p> <p>17 A. No.</p> <p>18 Q. Let's go to the next one. And I just</p> <p>19 want to confirm because it's the same questions, so I</p> <p>20 want to quickly just confirm, 2019 contract, Bates</p> <p>21 No. 31, essentially these are the same contracts as</p> <p>22 2016, '17 and '18; is that correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. In fact, No. 6, under paragraph</p> <p>25 2 -- I'm sorry, No. 5, you're not supposed to engage</p>	<p style="text-align: right;">Page 76</p> <p>1 MR. ZHU: I don't have Bates stamp 36</p> <p>2 here.</p> <p>3 MR. LIM: You don't?</p> <p>4 MR. ZHU: Yeah, I got it. It's D-5</p> <p>5 right now?</p> <p>6 MR. KWAK: Yes.</p> <p>7 Q. 36, this contract is virtually</p> <p>8 substantially similar to the previous ones that we</p> <p>9 have reviewed so far; is that right?</p> <p>10 A. Correct.</p> <p>11 Q. Okay.</p> <p>12 A. But not identical, though, because the</p> <p>13 person -- the signer who signed his name is</p> <p>14 different.</p> <p>15 Q. Of course. That goes without saying.</p> <p>16 That goes without saying.</p> <p>17 A. So, my answers were in accordance with</p> <p>18 what I just said.</p> <p>19 Q. Okay. No problem.</p> <p>20 Let's go to Bates No. 39 and I'll just</p> <p>21 quickly go through this. Again, under paragraph 7,</p> <p>22 No. 8 and 9, the same terms that appear in previous</p> <p>23 contracts appear here again; is that right?</p> <p>24 A. Yes.</p> <p>25 Q. Again and again you're reminded of how</p>
<p style="text-align: right;">Page 75</p> <p>1 in any act that's contrary to the national interests</p> <p>2 of South Korea; is that right? This is the same term</p> <p>3 that appears in every contract, right?</p> <p>4 A. Yes, that's correct.</p> <p>5 Q. And No. 6, the same term appears in</p> <p>6 every contract, right?</p> <p>7 A. Yes.</p> <p>8 Q. Let's go to Bates stamp No. 34, under</p> <p>9 paragraph 7, No. 8 and 9, the same terms how you will</p> <p>10 be evaluated, that's the same term that appears in</p> <p>11 every other contract; is that right?</p> <p>12 A. Correct.</p> <p>13 Q. In fact, again and again every contract</p> <p>14 you signed reminds you of how important it is for you</p> <p>15 to keep the classified information secret; is that</p> <p>16 right?</p> <p>17 A. Correct.</p> <p>18 Q. Okay. You have never done anything in</p> <p>19 violation of this agreement willfully, right?</p> <p>20 A. Correct.</p> <p>21 Q. You did your absolute best to comply</p> <p>22 with the term, though, correct?</p> <p>23 A. Correct.</p> <p>24 Q. Then let's go to document Bates stamped</p> <p>25 No. 36. The contract here you signed?</p>	<p style="text-align: right;">Page 77</p> <p>1 important it is for you to keep classified</p> <p>2 information secret; is that right?</p> <p>3 A. Correct.</p> <p>4 Q. Okay. Let's go to page 41. Here</p> <p>5 paragraph 3, again it says if the Mission requires,</p> <p>6 you will submit yourself to a polygraph test. Do you</p> <p>7 see, correct? You consent to a polygraph test; is</p> <p>8 that right?</p> <p>9 A. Correct.</p> <p>10 Q. Okay. And, all right, let's go to page</p> <p>11 42. We're almost there.</p> <p>12 MR. ZHU: We're talking about D-6 right</p> <p>13 now.</p> <p>14 Q. All right. I'd like to direct your</p> <p>15 attention to paragraph 2, No. 2. In this particular</p> <p>16 contract something new was added, that's protocols or</p> <p>17 ceremonial orders. Do you see that?</p> <p>18 A. Correct.</p> <p>19 Q. And that means when the minister</p> <p>20 attends international events, and you have to comply</p> <p>21 with the ceremonial orders or protocols that are</p> <p>22 required for each event; is that right?</p> <p>23 A. Correct.</p> <p>24 Q. And your testimony is you faithfully</p> <p>25 complied with every ceremonial order and protocols</p>

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<p style="text-align: right;">Page 78</p> <p>1 required for each event; is that right?</p> <p>2 A. Correct.</p> <p>3 Q. And because it is important for you to</p> <p>4 keep that because you were part of the Mission,</p> <p>5 correct?</p> <p>6 A. Correct.</p> <p>7 Q. Now, I want to direct you to the next</p> <p>8 document.</p> <p>9 (Defendant's Exhibit 9, dictionary</p> <p>10 definition of the protocols, was marked for</p> <p>11 identification.)</p> <p>12 MR. ZHU: For the record, it appears to</p> <p>13 be a Web printed document and contents four pages.</p> <p>14 Q. Okay. Mr. Nam, if you could just -- I</p> <p>15 want you to take a look at, just a quick look at what</p> <p>16 I just presented to you.</p> <p>17 A. Okay.</p> <p>18 Q. Okay. Did you understand that?</p> <p>19 A. Yes.</p> <p>20 Q. You understand the significance of the</p> <p>21 Korean word there, right?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Were you part of that ceremony</p> <p>24 when the minister attended event, meaning you gave</p> <p>25 him a ride?</p>	<p style="text-align: right;">Page 80</p> <p>1 MR. ZHU: I object to the form.</p> <p>2 Q. Okay. Let's go to the next question.</p> <p>3 Now, 47, the same pledge agreement that you signed</p> <p>4 before; is that right?</p> <p>5 A. Correct.</p> <p>6 Q. And paragraph 3 also requires -- I'm</p> <p>7 sorry, strike that.</p> <p>8 Paragraph 3 also says that in case the</p> <p>9 Mission requests, you would consent to voluntarily</p> <p>10 submitting yourself to a polygraph test concerning</p> <p>11 paragraphs 1 and 2; is that correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Now, in 2019, 2020 and 2021, do</p> <p>14 you believe as you sit here today that you engaged in</p> <p>15 any act that would violate the term that requires you</p> <p>16 not to divulge any information you acquired during</p> <p>17 the course of your employment to anyone that's not</p> <p>18 authorized to know?</p> <p>19 MR. ZHU: Objection to the form.</p> <p>20 Q. Do you believe?</p> <p>21 A. I don't believe that.</p> <p>22 Q. Because you tried to keep all the terms</p> <p>23 to the best of your ability?</p> <p>24 A. Correct.</p> <p>25 Q. Now, when you drove for the minister or</p>
<p style="text-align: right;">Page 79</p> <p>1 A. I only drove.</p> <p>2 Q. Okay. And you waited until the</p> <p>3 minister -- until the event was finished, correct?</p> <p>4 A. Correct.</p> <p>5 Q. Did you also drive the minister's</p> <p>6 guests sometimes, counterparts, officers, that were</p> <p>7 invited to those events?</p> <p>8 A. Correct.</p> <p>9 Q. Okay. And those guests are sometimes</p> <p>10 government officials, high government officials from</p> <p>11 other countries?</p> <p>12 A. Correct.</p> <p>13 Q. Did you also drive along with South</p> <p>14 Korea president's car and attend U.N. events?</p> <p>15 A. No.</p> <p>16 Q. Now, where are we? We're on the 2019</p> <p>17 contract. We're on the 2021, Bates stamp No. 42.</p> <p>18 Now, I want to direct your attention to</p> <p>19 paragraph 7, No. 8 and 9. These two terms appear in</p> <p>20 every contract you signed; is that correct?</p> <p>21 A. Correct.</p> <p>22 Q. And No. 10 here, they ask you to notify</p> <p>23 the Mission in case you marry someone that's not a</p> <p>24 South Korean national; is that right?</p> <p>25 A. Correct.</p>	<p style="text-align: right;">Page 81</p> <p>1 ministers, their safety was a very important concern</p> <p>2 to you, was it not?</p> <p>3 A. Correct.</p> <p>4 Q. And, in fact, because of that you</p> <p>5 always operated the vehicle in a safe manner,</p> <p>6 correct?</p> <p>7 A. Correct.</p> <p>8 Q. And the ministers are very important</p> <p>9 government officials in South Korea, right?</p> <p>10 A. Correct.</p> <p>11 Q. And since the safety of the ministers</p> <p>12 was important, did you sometimes check inside the car</p> <p>13 to make sure that the car was in good condition?</p> <p>14 A. Yes.</p> <p>15 Q. And did you always try to make sure</p> <p>16 that there are no trackers inside the car, there are</p> <p>17 no spying devices or anything like that inside the</p> <p>18 car?</p> <p>19 MR. ZHU: Objection. Relevancy.</p> <p>20 You can answer.</p> <p>21 A. I only followed the instructions that I</p> <p>22 was given. I was never given an instruction to do</p> <p>23 that.</p> <p>24 Q. So I understand that. Did you or did</p> <p>25 you not -- in other words, did you sweep the car to</p>

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<p>1 make sure that there is no device installed in your</p> <p>2 car?</p> <p>3 A. No.</p> <p>4 Q. When you were at the Mission's building</p> <p>5 waiting for the ministers' directions, did you</p> <p>6 perform any tasks or did you simply just wait at the</p> <p>7 building, at the office?</p> <p>8 A. No, I simply waited.</p> <p>9 Q. You knew that the ministers that you</p> <p>10 served, they were considered high level government</p> <p>11 officials inside Korea, right?</p> <p>12 A. Yes.</p> <p>13 Q. And now back in March 2018 you gave a</p> <p>14 ride to the secretary of U.N. secretary general,</p> <p>15 right?</p> <p>16 A. I would have to see my note to get the</p> <p>17 clear information.</p> <p>18 MR. KWAK: All right. This is Exhibit</p> <p>19 10.</p> <p>20 (Defendant's Exhibit 10, document Bates</p> <p>21 stamped P DOC S 000048, was marked for</p> <p>22 identification.)</p> <p>23 Q. No question pending.</p> <p>24 All right. I want to direct your</p> <p>25 attention to your notes. I just handed to you the</p>	<p>1 MR. ZHU: Objection to the form.</p> <p>2 MR. LIM: I haven't even asked. What</p> <p>3 are you objecting to?</p> <p>4 MR. ZHU: You asked him yes, that he</p> <p>5 has to provide an answer.</p> <p>6 MR. LIM: No.</p> <p>7 Q. Mr. Nam, can you look me in the eye?</p> <p>8 You were not supposed to write down anything that</p> <p>9 they discussed, correct? Nonetheless you wrote it</p> <p>10 down, did you not?</p> <p>11 A. This is my diary.</p> <p>12 Q. Okay. Look, listen to my question.</p> <p>13 You were not allowed to write down any notes</p> <p>14 concerning what these officials discussed,</p> <p>15 nonetheless you did so, did you not?</p> <p>16 MR. ZHU: Objection. It's harassment.</p> <p>17 Don't harass my client.</p> <p>18 A. Well, I had the right to.</p> <p>19 Q. You have the right. What right did you</p> <p>20 have and who gave you the right?</p> <p>21 MR. ZHU: Objection. Calls for legal</p> <p>22 conclusion.</p> <p>23 A. This was my journal.</p> <p>24 (Discussion off the record.)</p> <p>25 (Defendant's Exhibit 11, document Bates</p>
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<p>1 exhibit that's been marked as D-10 which is your</p> <p>2 notes. All right. I want to direct your attention</p> <p>3 to the portion dated March 2nd. Do you see that,</p> <p>4 sir?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. According to your note, the</p> <p>7 minister that you served at that time had a meeting</p> <p>8 with the secretary of U.N. secretary general; is that</p> <p>9 correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. They had lunch together?</p> <p>12 A. Yes.</p> <p>13 Q. And you gave a ride to both the</p> <p>14 minister and the secretary?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And they discussed something?</p> <p>17 A. I don't remember what they discussed</p> <p>18 about.</p> <p>19 Q. Now, I'm looking at your notes. It</p> <p>20 appears that you jotted down what they discussed. Do</p> <p>21 you see that?</p> <p>22 A. You know, based on this memo it seems</p> <p>23 to me that this is what I heard but I don't know the</p> <p>24 details about this particular conversation.</p> <p>25 Q. Mr. Nam?</p>	<p>1 stamped P DOC S 000272, was marked for</p> <p>2 identification.)</p> <p>3 BY MR. LIM:</p> <p>4 Q. I want to direct your attention to</p> <p>5 Exhibit D-11. I want to direct your attention to the</p> <p>6 portion of your memo dated October 13.</p> <p>7 A. Okay.</p> <p>8 Q. There you indicate who the minister</p> <p>9 met, that is Mr. Seo Hoon. Do you see that?</p> <p>10 A. Yes.</p> <p>11 Q. That's your handwriting, right?</p> <p>12 A. Yes.</p> <p>13 Q. You picked him up at JFK Airport,</p> <p>14 right?</p> <p>15 A. Yes.</p> <p>16 Q. And, in fact, Mr. Seo is the director</p> <p>17 of National Security Office to the South Korean</p> <p>18 president; is that right?</p> <p>19 A. I don't know what the title is.</p> <p>20 Q. That's a counterpart of National</p> <p>21 Security Advisory in the United States?</p> <p>22 MR. ZHU: Is there a question?</p> <p>23 MR. LIM: I'm asking.</p> <p>24 A. Okay. Yes.</p> <p>25 Q. Now, I'm not going to get into the</p>

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<p style="text-align: right;">Page 86</p> <p>1 details, but in your memo you indicated where he 2 went?</p> <p>3 A. Yes.</p> <p>4 Q. Why did you do that?</p> <p>5 A. This is my diary.</p> <p>6 Q. Where the national security advisor to 7 the president, where he went is your diary?</p> <p>8 MR. ZHU: Objection. That's 9 argumentative.</p> <p>10 A. I'm allowed to write anything I want in 11 my diary.</p> <p>12 Q. Did you tell anyone about this?</p> <p>13 A. No, I've never told anyone about it. 14 The only thing I did was to provide this diary 15 journal to my attorney.</p> <p>16 Q. You did not tell anyone because you 17 thought it was important, correct, not to tell 18 anyone, right?</p> <p>19 A. No, not because it was important. 20 Other than the private matter, I never recorded any 21 information in my journal. I am saying because this 22 is my private diary, this is where I decided to write 23 down the information and other than in my diary, I 24 never divulged this information to anyone.</p> <p>25 MR. LIM: Okay. We're going to take a</p>	<p style="text-align: right;">Page 88</p> <p>1 where the heads of the states participated?</p> <p>2 A. Not to my recollection.</p> <p>3 Q. Did the ministers ever attend 4 international events where high ranking government 5 officials from other states participated?</p> <p>6 MR. ZHU: Objection. Foundation.</p> <p>7 A. No.</p> <p>8 Q. Do you know the high-level week?</p> <p>9 A. Yes.</p> <p>10 Q. What is it?</p> <p>11 A. A week that has important events 12 scheduled.</p> <p>13 Q. In fact, this is related to United 14 Nations General Assembly, right?</p> <p>15 A. I was not really familiar with the 16 scheduled events. I just went or drove wherever I 17 was told to go to.</p> <p>18 Q. I understand that. I understand that. 19 My question to you is, the high-level week is an 20 event related to United Nations General Assembly, 21 right?</p> <p>22 A. Yes.</p> <p>23 Q. In fact, all of the heads of the 24 country would convene to attend that during the week, 25 correct?</p>
<p style="text-align: right;">Page 87</p> <p>1 five-minute break.</p> <p>2 (Discussion off the record.)</p> <p>3 (Recess taken.)</p> <p>4 BY MR. LIM:</p> <p>5 Q. Now isn't it true that the president of 6 South Korea came here every year except for once, 7 right, since 2016 to 2021?</p> <p>8 A. Correct.</p> <p>9 Q. And when the president attended events, 10 the minister that you drove for also attended those 11 events, correct?</p> <p>12 A. I wouldn't know because I was not part 13 of the force who attended those events.</p> <p>14 Q. That's not my question. My question 15 is, do you recall whether or not the ministers that 16 you drove for attended some events if not all, some 17 event that the president of South Korea attended?</p> <p>18 A. No.</p> <p>19 Q. Are you saying that the ministers never 20 attended events where the president of South Korea 21 ever attended?</p> <p>22 MR. ZHU: Objection. Foundation.</p> <p>23 A. No.</p> <p>24 Q. Okay. Have you -- strike that. 25 Did the ministers ever attend events</p>	<p style="text-align: right;">Page 89</p> <p>1 MR. ZHU: Objection. Foundation.</p> <p>2 A. I wouldn't know that.</p> <p>3 Q. In fact, it happens -- it goes on for 4 about a week or so, right?</p> <p>5 MR. ZHU: Objection. Foundation.</p> <p>6 A. Yes.</p> <p>7 Q. And, in fact, it happens sometime in 8 September or October every year?</p> <p>9 A. Yes.</p> <p>10 Q. Isn't it true that ministers attended 11 those events during that week?</p> <p>12 A. Well, I don't know if the ministers 13 attended those events. However, I certainly did not 14 attend any.</p> <p>15 Q. I understand that. Did the ministers 16 attend those events?</p> <p>17 MR. ZHU: Objection. Foundation. He's 18 not there.</p> <p>19 A. I have never gotten a request to drive 20 somebody to those events.</p> <p>21 Q. Did you drive them -- so as you sit 22 here today, your testimony under oath is you never 23 went to any of those events? Are you sure?</p> <p>24 A. Now, I have never told -- I have never 25 been told by my employer what type of event I was</p>

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<p>1 driving people to. The only way I found out what</p> <p>2 kind of events were happening was through newspapers.</p> <p>3 Q. Sir, see, now you're giving me a</p> <p>4 narrative again. I'm just asking a simple question.</p> <p>5 If you don't know, you don't know. Just say yes or</p> <p>6 no. Okay?</p> <p>7 Now, you say you knew what the</p> <p>8 high-level week was. You said that. Now, did you</p> <p>9 attend any event -- did the ministers attend any</p> <p>10 event during the high-level week?</p> <p>11 MR. ZHU: Objection. Foundation.</p> <p>12 A. I do not know.</p> <p>13 Q. Then how did you come to know what the</p> <p>14 high-level week was?</p> <p>15 A. From a newspaper.</p> <p>16 Q. You know that when the president of</p> <p>17 South Korea came, did you ever follow the ministers</p> <p>18 to inspect the route the president of South Korea was</p> <p>19 going to take?</p> <p>20 A. Well, prior to any event I was never</p> <p>21 told what type of event was going to take place. As</p> <p>22 long as I was told to drive them somewhere, I</p> <p>23 followed that instruction and I drove them.</p> <p>24 Q. So, again, that wasn't my question.</p> <p>25 Okay? We're going to be here all day if you keep</p>	<p>1 A. Yes.</p> <p>2 MR. ZHU: For the record, defense</p> <p>3 counsel has a certain page -- defendant pulled out</p> <p>4 some certain -- a certain page and put a document in</p> <p>5 front of the witness.</p> <p>6 MR. LIM: We'll do that. I don't know</p> <p>7 what your problem is, counsellor. We're showing him</p> <p>8 the same document that you're seeing and I'm seeing.</p> <p>9 MR. ZHU: Can I know the Bates?</p> <p>10 MR. KWAK: Hold on, please.</p> <p>11 MR. LIM: All right. Bates stamped No.</p> <p>12 97.</p> <p>13 BY MR. LIM:</p> <p>14 Q. This is the hours and notes that you</p> <p>15 wrote down, correct?</p> <p>16 A. Correct.</p> <p>17 Q. I want direct your attention to the</p> <p>18 entry dated September 11th.</p> <p>19 A. Okay.</p> <p>20 Q. You see that, sir?</p> <p>21 A. Yes.</p> <p>22 Q. And you're claiming that you worked</p> <p>23 beyond the designated work hours this day, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Because you went to 56th Street?</p>
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<p>1 answering that way.</p> <p>2 Let me ask you this: Did you ever</p> <p>3 drive the ministers or did you ever drive for the</p> <p>4 ministers because the ministers had to inspect the</p> <p>5 route that the president of South Korea was going to</p> <p>6 take when he came here?</p> <p>7 MR. ZHU: Objection. Foundation.</p> <p>8 A. I don't know because I was never</p> <p>9 explained what my task was prior to being asked to do</p> <p>10 a task.</p> <p>11 Q. I see. Do you remember D-8?</p> <p>12 A. Yes.</p> <p>13 Q. You testified earlier that this is what</p> <p>14 you wrote down, right?</p> <p>15 A. Correct.</p> <p>16 Q. Everything in there, right?</p> <p>17 A. Well, I was told what and how to write</p> <p>18 it by the minister, so I followed that instruction.</p> <p>19 Q. Sir, again, don't give me the</p> <p>20 narrative. I'm asking you did you write it down,</p> <p>21 that's my question. Yes or no?</p> <p>22 A. Yes.</p> <p>23 Q. Okay. Now, everything in here you</p> <p>24 wrote it down, correct, meaning that's your</p> <p>25 handwriting?</p>	<p>1 A. Correct.</p> <p>2 Q. And right below that you see VIP</p> <p>3 related events? You see that?</p> <p>4 A. Yes.</p> <p>5 Q. That's your handwriting?</p> <p>6 A. It's not my handwriting.</p> <p>7 Q. Whose handwriting is that?</p> <p>8 A. I don't know.</p> <p>9 Q. That VIP in fact is referring to the</p> <p>10 president of South Korea, right?</p> <p>11 MR. ZHU: Objection. Foundation.</p> <p>12 A. I presented what I wrote down and I</p> <p>13 don't know with regard to the part that you're</p> <p>14 talking about, I don't know how it's there.</p> <p>15 Q. You know that at the Mission the</p> <p>16 president of South Korea is referred to as the VIP?</p> <p>17 Tell the truth. Right?</p> <p>18 A. No, the truth is that the president was</p> <p>19 not called -- referred to as VIP. They used some</p> <p>20 other terminology.</p> <p>21 Q. What's the terminology?</p> <p>22 A. I can't recall it but it wasn't VIP.</p> <p>23 Q. Do you know whether or not then that</p> <p>24 term VIP refers to someone else other than the</p> <p>25 president?</p>

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<p>1 A. No. At the time I really was not 2 interested in anything like this. I just drove when 3 I was asked to drive.</p> <p>4 Q. In fact, you got a security clear pass 5 to attend, to access the events during the high-level 6 week, correct?</p> <p>7 MR. ZHU: Objection. Time frame.</p> <p>8 A. Correct.</p> <p>9 Q. All right. You know that the Mission 10 spends months to prepare for the U.N. General 11 Assembly events, right?</p> <p>12 A. Like I said before, other than driving 13 for people who needed the transportation, other than 14 that, I was not privied to other information or not 15 interested in other information.</p> <p>16 Q. Okay. Did you ever scout the U.N. 17 vicinity and president's route with the ministers? 18 In other words, when the ministers performed this 19 duty, did you give them a ride?</p> <p>20 A. Now, in the five years that I worked 21 for the Mission, I was never given a schedule for 22 that day or the purpose of my task. What I was 23 privied to was once people got into my car, I would 24 be told what the immediate destination is but then I 25 wouldn't be told if there are other further</p>	<p>1 Q. Okay. Now, do you know whether or not 2 these other drivers drove for your ministers?</p> <p>3 A. As far as I know, no.</p> <p>4 Q. Have you spoken with any of them since 5 you left the Mission?</p> <p>6 MR. ZHU: Objection. Relevancy.</p> <p>7 A. No, never.</p> <p>8 Q. And these drivers, the four drivers 9 that we did not name, these drivers, their primary 10 responsibility was to pick up diplomatic pouches or 11 bags from the airport, right?</p> <p>12 MR. ZHU: Objection. Foundation.</p> <p>13 A. I wouldn't know.</p> <p>14 Q. But you didn't do any of this, right, 15 picking up diplomatic pouch and bags from the 16 airport?</p> <p>17 A. That's correct.</p> <p>18 Q. In fact, you went to the airport by 19 yourself if the ministers were not available to pick 20 up ministers' guests at the airport, right?</p> <p>21 A. Never.</p> <p>22 Q. Never?</p> <p>23 A. Correct.</p> <p>24 Q. You always --</p> <p>25 A. It was always with somebody in the car.</p>
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<p>1 additional destinations. So only when people get 2 into my car, that's when I will know where I should 3 be taking them.</p> <p>4 Q. I understand. But do you know at the 5 Mission there were other drivers besides you?</p> <p>6 A. A lot.</p> <p>7 Q. About four or five drivers?</p> <p>8 A. Yes.</p> <p>9 Q. And there was one driver for the 10 ambassador?</p> <p>11 A. Correct.</p> <p>12 Q. I'm not going to name who they are but 13 there are about four Korean drivers?</p> <p>14 A. Correct.</p> <p>15 Q. Okay. And they were on rotation to 16 drive official vehicles, any official vehicle 17 available at the Mission, correct?</p> <p>18 MR. ZHU: Objection to the form.</p> <p>19 A. No.</p> <p>20 Q. Are you telling me that they drove your 21 vehicle? You already testified that they never drove 22 your vehicle.</p> <p>23 A. Now, with regard to the car that I 24 drove, no one else drove it because it was designated 25 to me.</p>	<p>1 Q. Okay. Government officials?</p> <p>2 A. Correct.</p> <p>3 Q. Okay. Do you know whether or not these 4 drivers that we did not name, did they have a 5 designated vehicle like you did?</p> <p>6 A. I don't know.</p> <p>7 Q. Do you know whether or not these 8 drivers signed the same pledge agreement as you did?</p> <p>9 A. I don't know that either.</p> <p>10 Q. Do you know whether or not these 11 drivers signed the employment contracts like you did?</p> <p>12 A. I don't know.</p> <p>13 Q. Do you know whether or not these 14 drivers went through a security clearance like you 15 did?</p> <p>16 MR. ZHU: I'll object to this line of 17 question as to relevance.</p> <p>18 A. I don't know.</p> <p>19 Q. Other than your counsel, did you 20 disclose or divulge any information you had learned 21 or acquired through the course of employment at the 22 Mission to your CPA or other professionals?</p> <p>23 A. No.</p> <p>24 Q. Now, you knew that according to South 25 Korean laws you were to retire at the age of 60,</p>

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<p>1 correct?</p> <p>2 A. Well, as far as under the Korean law</p> <p>3 with regard to the short-term, for an employee who</p> <p>4 signed the short-term contract, there is no age limit</p> <p>5 as far as the retirement.</p> <p>6 Q. Sir, here is my question: When you</p> <p>7 began to work for the Mission, isn't it true that Mr.</p> <p>8 Choi told you you would have to retire at the age of</p> <p>9 60 according to Korean law?</p> <p>10 A. He didn't.</p> <p>11 Q. Did anybody ever tell you that you</p> <p>12 should retire at the age of 60 according to South</p> <p>13 Korean law?</p> <p>14 MR. ZHU: Objection. Asked and</p> <p>15 answered.</p> <p>16 A. That was Mr. Lee.</p> <p>17 Q. You mean the Minister Lee?</p> <p>18 A. Correct.</p> <p>19 Q. That's back in 2018?</p> <p>20 A. As far as I can remember, I believe it</p> <p>21 was in 2019.</p> <p>22 Q. Okay. In 2019, how old were you? Were</p> <p>23 you 58?</p> <p>24 A. What was the year?</p> <p>25 Q. Or 59, right?</p>	<p>1 employment, correct? Yes or no?</p> <p>2 A. Yes.</p> <p>3 Q. In fact, you told him that because of</p> <p>4 the pandemic your wife is out a job, you cannot find</p> <p>5 a job, so you asked the Mission to extend your</p> <p>6 employment beyond 60 years old?</p> <p>7 MR. ZHU: Objection. Asked and</p> <p>8 answered.</p> <p>9 A. No.</p> <p>10 Q. Your wife had a job at the time?</p> <p>11 A. No, she lost her job due to the</p> <p>12 pandemic.</p> <p>13 Q. I understand in 2020 during the</p> <p>14 pandemic you could not find a job elsewhere, correct?</p> <p>15 A. Correct.</p> <p>16 Q. So you asked the Mission to extend the</p> <p>17 employment and they did, right?</p> <p>18 MR. ZHU: Objection. Asked and</p> <p>19 answered.</p> <p>20 Q. Correct?</p> <p>21 A. Yes.</p> <p>22 Q. In fact, in order for you to get the</p> <p>23 extension, the Mission had to get permission from</p> <p>24 Korea, right?</p> <p>25 MR. ZHU: Objection. Foundation.</p>
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<p>1 A. We're talking about 2019, right?</p> <p>2 Q. Correct.</p> <p>3 A. Yes.</p> <p>4 Q. In fact, in 2019 you signed two</p> <p>5 different contracts, right?</p> <p>6 A. Correct.</p> <p>7 Q. One was for a period of two or three</p> <p>8 months?</p> <p>9 A. We're talking about 2019, right?</p> <p>10 Q. Yep.</p> <p>11 A. No, in 2019 I only signed one one-year</p> <p>12 contract.</p> <p>13 Q. And you became 60 years old in 2020?</p> <p>14 A. Correct.</p> <p>15 Q. And when you became -- when you turned</p> <p>16 60 years old, the Mission told you that according to</p> <p>17 South Korean law, you have to retire?</p> <p>18 MR. ZHU: Objection.</p> <p>19 Q. Correct?</p> <p>20 MR. ZHU: Is there a question?</p> <p>21 A. Yes.</p> <p>22 Q. And then you then asked Mr. Jo who is</p> <p>23 sitting here today because of the pandemic you could</p> <p>24 not find a job elsewhere, therefore you asked the</p> <p>25 Mission to extend your employment to extend the</p>	<p>1 A. Well, at the time Mr. Jo made requests</p> <p>2 and I complied with those requests. However, later</p> <p>3 on I found out those requests were not honest or</p> <p>4 truth, so that's why I objected.</p> <p>5 Q. Are you saying that the Mission never</p> <p>6 contacted Korea to extend your employment?</p> <p>7 A. Well, I don't know that for sure,</p> <p>8 however, at the time he told me that in order for my</p> <p>9 employer to extend my employment, I was supposed to</p> <p>10 follow a certain procedures.</p> <p>11 Q. I understand that. That's not my</p> <p>12 question. My question is this: You were told in</p> <p>13 2019 that you had to retire at the age of 60,</p> <p>14 correct?</p> <p>15 A. Correct.</p> <p>16 Q. And you asked for an extension,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. And they granted you an extension about</p> <p>20 14 months after they got permission from Korea; is</p> <p>21 that right?</p> <p>22 MR. ZHU: Objection. Foundation.</p> <p>23 A. Correct.</p> <p>24 Q. And, in fact, they told you that in</p> <p>25 order to make an exception for you, they had to get</p>

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<p>1 permission from Korea, correct?</p> <p>2 A. Correct.</p> <p>3 Q. In fact, they -- because you pled with</p> <p>4 them that you could not find a job during the</p> <p>5 pandemic, you said you need more time, correct? Yes</p> <p>6 or no?</p> <p>7 A. Yes.</p> <p>8 Q. Okay. And it took a few months to get</p> <p>9 permission from Korea to extend your employment,</p> <p>10 correct?</p> <p>11 A. Correct.</p> <p>12 Q. Now, and for that you signed a</p> <p>13 contract?</p> <p>14 A. Yes.</p> <p>15 Q. Now, and one of the requirements that</p> <p>16 you had to comply with or that Mission requested was</p> <p>17 in order for you to get an extension of your</p> <p>18 employment was to sign an agreement that you're not</p> <p>19 going to assert any claims with respect to your</p> <p>20 termination at the Mission, correct? We're going to</p> <p>21 ask you the questions. Just answer my question.</p> <p>22 Correct?</p> <p>23 A. Correct.</p> <p>24 Q. Okay. Now, while we're waiting for an</p> <p>25 exhibit, while you worked at the Mission, you saw</p>	<p>1 A. Correct.</p> <p>2 Q. And in order for the Mission to be able</p> <p>3 to extend your employment, you were told that you had</p> <p>4 to sign this, correct?</p> <p>5 A. Correct.</p> <p>6 Q. And according to this agreement, you</p> <p>7 are not allowed or you agreed, you agreed not to</p> <p>8 assert any claims with respect to your termination as</p> <p>9 your employment ends on June 30, 2021?</p> <p>10 A. Correct.</p> <p>11 Q. And after you signed this, at the time</p> <p>12 you signed this, you assured the employees at the</p> <p>13 Mission that you would abide by this agreement,</p> <p>14 correct?</p> <p>15 A. Well, once I signed this document,</p> <p>16 someone took this document. I was not immediately</p> <p>17 given a copy, so it took about six months for me to</p> <p>18 get a copy.</p> <p>19 Q. I understand that. You got a copy of</p> <p>20 it. And at the time you signed this, you had every</p> <p>21 intention in good faith to abide by this agreement,</p> <p>22 correct?</p> <p>23 A. My understanding was that this</p> <p>24 agreement would extend my employment for one year.</p> <p>25 Q. I understand that. So according to</p>
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<p>1 other people retiring from their job when they</p> <p>2 reached the age of 60?</p> <p>3 A. Never.</p> <p>4 Q. You never saw anyone?</p> <p>5 A. No, I didn't see anyone who retired at</p> <p>6 the age of 60. However, I saw someone retiring at</p> <p>7 the age of 62 and another person retiring at the age</p> <p>8 of 61.</p> <p>9 Q. In this case, you're retired or</p> <p>10 separated from the Mission at the age of 61 because</p> <p>11 of extension, correct?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. Now, we're going to introduce</p> <p>14 that exhibit.</p> <p>15 MR. KWAK: Exhibit 12.</p> <p>16 (Defendant's Exhibit 12, Settlement</p> <p>17 Agreement, was marked for identification.)</p> <p>18 MR. ZHU: I'll put on the record I'll</p> <p>19 object to you introducing the settlement agreement</p> <p>20 since it's already been concluded by the Court.</p> <p>21 MR. LIM: There was a pre-answer</p> <p>22 motion.</p> <p>23 BY MR. LIM:</p> <p>24 Q. Now, this is your signature, correct?</p> <p>25 This is your name?</p>	<p>1 Korean law you're supposed to retire in 2020 but your</p> <p>2 employment was extended until June 30, 2021, correct?</p> <p>3 A. No, that's wrong.</p> <p>4 Q. What is wrong?</p> <p>5 A. Well, for an employee who signs a</p> <p>6 yearly contract is not subject -- an employee who</p> <p>7 signs a yearly contract is not subject to retirement</p> <p>8 age.</p> <p>9 Q. Okay. That's not my question.</p> <p>10 My question is this: According to this</p> <p>11 contract when you signed it, you agreed not to assert</p> <p>12 any claims related to your employment at the Mission,</p> <p>13 correct?</p> <p>14 MR. ZHU: Objection. It's not a fair</p> <p>15 reading.</p> <p>16 Q. Okay. Just answer my question.</p> <p>17 A. No.</p> <p>18 Q. What was your intention?</p> <p>19 A. My understanding of this agreement is</p> <p>20 that any issues arising out of this one-year</p> <p>21 extension I was not going to make any type of claims.</p> <p>22 Q. Okay. So, after you separated from the</p> <p>23 Mission, as you testified earlier, you were able to</p> <p>24 find a job a month later, correct?</p> <p>25 A. Yes.</p>

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<p>1 Q. Now, because of your separation from</p> <p>2 the Mission, did you ever have to see a doctor or</p> <p>3 take any medication?</p> <p>4 A. Yes.</p> <p>5 Q. Okay. What's the name of the doctor?</p> <p>6 A. Dr. Haeyang Chung.</p> <p>7 Q. What kind of doctor is he?</p> <p>8 A. Internal.</p> <p>9 Q. Internist?</p> <p>10 A. Yes.</p> <p>11 Q. And did the doctor diagnose you that</p> <p>12 whatever condition -- strike that.</p> <p>13 (REQ) MR. LIM: We're going to make a request</p> <p>14 for the production of medical records. We'll send</p> <p>15 you a medical authorization so you can sign off ON it</p> <p>16 and produce the medical records.</p> <p>17 MR. ZHU: We'll take it under</p> <p>18 advisement.</p> <p>19 BY MR. LIM:</p> <p>20 Q. So, now, Mr. Nam, where is the doctor</p> <p>21 in Jersey or New York?</p> <p>22 A. New Jersey.</p> <p>23 Q. Where is his office?</p> <p>24 A. On Broadway, Palisades Park.</p> <p>25 Q. And when was the first time you saw</p>	<p>1 Q. Mr. Nam, did the doctor tell you that</p> <p>2 your symptoms are related to your work experience at</p> <p>3 the Mission? Did he say that?</p> <p>4 A. No.</p> <p>5 Q. Did you take any medication afterwards?</p> <p>6 A. No.</p> <p>7 Q. Is there any professional that you can</p> <p>8 produce in this case that will testify for you that</p> <p>9 your medical conditions, your alleged medical</p> <p>10 conditions are related to your experience at the</p> <p>11 Mission?</p> <p>12 MR. ZHU: Objection. It calls for a</p> <p>13 legal conclusion and is subject to discovery.</p> <p>14 A. No.</p> <p>15 Q. Other than the one occasion you</p> <p>16 described, did you see the doctor afterwards?</p> <p>17 A. Yes.</p> <p>18 Q. Is it related to your work experience</p> <p>19 at the Mission?</p> <p>20 A. Yes, that's what I believe. So because</p> <p>21 I didn't get a clear answer from Dr. Chung, I went</p> <p>22 for a second opinion.</p> <p>23 Q. Who is that second opinion?</p> <p>24 A. It was a non-Korean doctor.</p> <p>25 Q. What's the name of the doctor?</p>
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<p>1 this doctor?</p> <p>2 A. I believe it was in or around June 20,</p> <p>3 2021.</p> <p>4 Q. That was the first time you saw this</p> <p>5 doctor?</p> <p>6 A. Correct.</p> <p>7 Q. Did you see any other doctor other than</p> <p>8 this one?</p> <p>9 A. No.</p> <p>10 Q. Okay. And what did the doctor tell</p> <p>11 you? Strike that.</p> <p>12 What are the symptoms that caused you</p> <p>13 to go see this doctor?</p> <p>14 A. I get depression. Couldn't get a good</p> <p>15 night sleep, anxiety and loss of motivation.</p> <p>16 Q. So if I look at your doctor's records,</p> <p>17 will they show what you just testified?</p> <p>18 A. I don't know but the doctor gave me a</p> <p>19 list of tests to have done. However, at the time my</p> <p>20 medical insurance was about to end, so because of the</p> <p>21 financial situation, I didn't.</p> <p>22 Q. What are the tests that he recommended</p> <p>23 that you undertake?</p> <p>24 A. Well, lung and heart test and endoscopy</p> <p>25 and colonoscopy.</p>	<p>1 A. I don't remember because it was not a</p> <p>2 Korean name.</p> <p>3 Q. What kind of doctor is he?</p> <p>4 A. I believe he was a general medicine.</p> <p>5 Q. Okay. When did you see him?</p> <p>6 A. In August.</p> <p>7 Q. 2000 what, '21?</p> <p>8 A. Yes.</p> <p>9 Q. What did you do?</p> <p>10 A. Blood tests, EKG.</p> <p>11 Q. Okay. Did he tell you that whatever</p> <p>12 symptoms you had at the time are related to your job</p> <p>13 experience at the Mission?</p> <p>14 A. No, the doctor didn't say that.</p> <p>15 However, I did explain my symptoms to my doctor.</p> <p>16 Q. What's the address of this doctor?</p> <p>17 A. Can I look at my phone?</p> <p>18 Q. Please.</p> <p>19 MR. KWAK: And if you can look for the</p> <p>20 name too, please do.</p> <p>21 A. No, I can't find the name of the</p> <p>22 doctor. Sorry, I don't have the doctor's address</p> <p>23 stored in my phone, so...</p> <p>24 Q. Do you know the town by any chance?</p> <p>25 A. West New York.</p>

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<p>1 Q. The name, please?</p> <p>2 A. I can't find it.</p> <p>3 Q. Okay. Now, any other doctor that you</p> <p>4 can name?</p> <p>5 A. So, in August I didn't get an answer</p> <p>6 from my second doctor, so I went back to Dr. Chung in</p> <p>7 December.</p> <p>8 Q. Okay. And did the doctor tell you that</p> <p>9 whatever symptoms you had at the time were caused by</p> <p>10 or related to your experience at the Mission?</p> <p>11 A. I never talked about my work with the</p> <p>12 doctor. I only explained what my symptoms were.</p> <p>13 Q. Okay. We're going to take a</p> <p>14 five-minute bathroom break. I'll be right back.</p> <p>15 (Recess taken.)</p> <p>16 (Defendant's Exhibit 13, handwritten</p> <p>17 notes, was marked for identification.)</p> <p>18 MR. KWAK: I'm going to give him the</p> <p>19 marked copy for now. He'll use that and at the end</p> <p>20 of the day, we'll take the original back.</p> <p>21 BY MR. LIM:</p> <p>22 Q. Mr. Nam, we marked your handwritten</p> <p>23 notes D-13.</p> <p>24 A. Okay.</p> <p>25 Q. These are the notes that you took</p>	<p>1 A. Okay.</p> <p>2 Q. In fact, you cannot contact the media</p> <p>3 to disclose the information that has been deemed</p> <p>4 confidential or top secret or classified information.</p> <p>5 Do you understand that, sir?</p> <p>6 A. I do.</p> <p>7 Q. If you violate that, there will be some</p> <p>8 legal consequences.</p> <p>9 A. Okay.</p> <p>10 Q. Now, let's come back to this note. I'm</p> <p>11 not going to go over everything and I want you to</p> <p>12 read the statement that you made next to No. 3.</p> <p>13 A. "I worked as a chauffeur to" --</p> <p>14 THE INTERPRETER: May the interpreter</p> <p>15 ask one word, please?</p> <p>16 MR. LIM: Official vehicle, you already</p> <p>17 translated.</p> <p>18 A. -- "and I drove the official vehicle.</p> <p>19 I was not a personal driver."</p> <p>20 Q. Okay. In fact, that's your testimony</p> <p>21 throughout the proceeding today?</p> <p>22 A. Correct.</p> <p>23 Q. Okay. And how about the next?</p> <p>24 A. "Because I did not receive any specific</p> <p>25 security related training, it's difficult for me to</p>
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<p>1 during the course of deposition today, right?</p> <p>2 A. Yes.</p> <p>3 Q. And I'm going through, if you could</p> <p>4 just read the first line to the translator so the</p> <p>5 translator can translate for us, let's do that.</p> <p>6 A. Now, with regards to the first</p> <p>7 paragraph that you see at the top of the paper, I had</p> <p>8 originally written this before I came to deposition</p> <p>9 today in order to remind myself how to or how not to</p> <p>10 answer. So when I wanted to talk about this with my</p> <p>11 attorney, my attorney stopped me from speaking with</p> <p>12 him about it during the deposition. So, other than</p> <p>13 that, the other paragraphs below that are the</p> <p>14 subjects that came out today which I hadn't discussed</p> <p>15 prior to today, so I decided to write a note.</p> <p>16 Q. Okay. What was your intention in</p> <p>17 taking these notes? Were you going to send this to</p> <p>18 someone else outside of this proceeding?</p> <p>19 A. No, just to remind myself.</p> <p>20 Q. Mr. Nam, I just have to respectfully</p> <p>21 remind you of the confidentiality order signed by</p> <p>22 Judge Nathan and the pledge agreements you signed.</p> <p>23 A. Yes.</p> <p>24 Q. You are not allowed to talk to anyone</p> <p>25 not authorized to know certain information.</p>	<p>1 answer specific questions."</p> <p>2 Q. That's the note that you made for</p> <p>3 yourself, correct?</p> <p>4 A. Correct.</p> <p>5 Q. So you were going to answer according</p> <p>6 to this quote guideline?</p> <p>7 A. No. After that is deposition was over,</p> <p>8 I didn't want to forget about the dep today, so I</p> <p>9 made a note to remind myself.</p> <p>10 Q. Once again, I'm going to -- we marked</p> <p>11 it but don't discuss certain information with anyone</p> <p>12 outside of this litigation, please.</p> <p>13 MR. ZHU: Objection. No question</p> <p>14 pending.</p> <p>15 A. Understood.</p> <p>16 Q. That includes your friends, okay? Do</p> <p>17 you understand that, sir?</p> <p>18 A. Yes.</p> <p>19 Q. After you left the Mission, you were</p> <p>20 supposed to be paid a severance according to South</p> <p>21 Korean law, correct?</p> <p>22 A. Correct.</p> <p>23 Q. In fact, the Mission offered to pay you</p> <p>24 a severance according to the South Korean law</p> <p>25 calculation, correct?</p>

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<p>1 A. Correct.</p> <p>2 Q. In fact, you did not come and pick up</p> <p>3 the check, correct? Yes or no?</p> <p>4 A. I did, once.</p> <p>5 Q. When did you come to pick up the check?</p> <p>6 A. I believe it was in or around June</p> <p>7 29th.</p> <p>8 Q. June 29, 2021?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. What time did you come?</p> <p>11 A. Around 11 a.m.</p> <p>12 Q. Okay. Who did you talk to?</p> <p>13 A. Mr. Chung and Mr. Kim.</p> <p>14 Q. And at the time you were not even</p> <p>15 terminated by the Mission?</p> <p>16 A. Correct.</p> <p>17 Q. So it's not that you came to pick up</p> <p>18 the check after you left the Mission, you were still</p> <p>19 working for the Mission at the time, correct?</p> <p>20 A. Correct.</p> <p>21 Q. So, now, are you saying that at the</p> <p>22 time you were still working at the Mission, the</p> <p>23 Mission offered you a severance?</p> <p>24 A. I was told to visit the Mission because</p> <p>25 they wanted to talk to me about something.</p>	<p>1 come and pick up the check for the severance?</p> <p>2 A. No.</p> <p>3 Q. Never?</p> <p>4 A. Correct, no.</p> <p>5 Q. And your testimony is as you sit here</p> <p>6 today I want to pick up the check but I was advised</p> <p>7 not to pick up the check?</p> <p>8 MR. ZHU: Objection to the form.</p> <p>9 Q. Is that right?</p> <p>10 A. Well, I was never advised not to do</p> <p>11 that. However, I was told that the severance pay</p> <p>12 would be paid in check. However, I didn't end up</p> <p>13 receiving one.</p> <p>14 Q. Again, now, listen to me. So you were</p> <p>15 told by someone at the Mission to pick up the check</p> <p>16 for the severance, correct? Yes or no?</p> <p>17 A. No.</p> <p>18 Q. Never?</p> <p>19 A. No.</p> <p>20 Q. So no one ever told you to receive a</p> <p>21 check for severance?</p> <p>22 MR. ZHU: Objection. Asked and</p> <p>23 answered.</p> <p>24 A. Correct.</p> <p>25 MR. LIM: We're going to mark an</p>
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<p>1 Q. Okay. And you just testified that you</p> <p>2 came to pick up the check for the severance, correct?</p> <p>3 A. That's what I was thinking. I was</p> <p>4 thinking maybe they are trying to give me a check for</p> <p>5 the severance pay.</p> <p>6 Q. Okay. My question is this: Did anyone</p> <p>7 tell you at the time that you would pick up the</p> <p>8 check, you would be paid severance today on June 28th</p> <p>9 or June 29th?</p> <p>10 A. No.</p> <p>11 Q. So then listen to my question, sir.</p> <p>12 After you left the Mission, did anyone offer you a</p> <p>13 severance, yes or no?</p> <p>14 A. I mean, there was no specific</p> <p>15 instruction as to when the check was going to be</p> <p>16 paid, however, there was a discussion about how it</p> <p>17 was going to be paid.</p> <p>18 Q. Okay. And, in fact, isn't it true that</p> <p>19 Mr. Jo sitting here today contacted you via Kakao</p> <p>20 Talk asking you to come and pick up the check for the</p> <p>21 severance which was calculated according to South</p> <p>22 Korean law, correct?</p> <p>23 A. No, Mr. Jo never send me a message and</p> <p>24 Mr. Kim never asked me to do that either.</p> <p>25 Q. Did anyone at the Mission ask you to</p>	<p>1 exhibit. Just wait. We're going to print it out.</p> <p>2 (Pause in the proceedings.)</p> <p>3 (Defendant's Exhibit 14, text messages,</p> <p>4 were marked for identification.)</p> <p>5 MR. LIM: All right. Let's show him</p> <p>6 D-14.</p> <p>7 BY MR. LIM:</p> <p>8 Q. Mr. Nam, I just presented to you what's</p> <p>9 been marked as D-14. These are the text messages</p> <p>10 that you exchanged with Mr. Kim who is present in</p> <p>11 this proceeding today.</p> <p>12 MR. ZHU: Put on the record our</p> <p>13 objection. This document was not produced any time</p> <p>14 before today.</p> <p>15 MR. LIM: It's for impeachment purposes</p> <p>16 only. So we can go ahead.</p> <p>17 Q. Now, Mr. Nam, you recognize these text</p> <p>18 messages, correct?</p> <p>19 A. Yes.</p> <p>20 Q. In fact, you exchanged these messages</p> <p>21 with Mr. Kim, correct?</p> <p>22 A. Yes.</p> <p>23 Q. In fact, at the top of the page and</p> <p>24 Mr. Kim told you that severance pay is now available,</p> <p>25 we wanted to check the message. Do you see that text</p>

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<p>1 message, sir?</p> <p>2 A. Yes.</p> <p>3 Q. And in fact you responded to that</p> <p>4 saying I cannot call you for some reason, right?</p> <p>5 A. Correct.</p> <p>6 Q. In fact, and then Mr. Kim in response</p> <p>7 to that said "Do you want me to call you tomorrow?"</p> <p>8 Correct?</p> <p>9 A. Yes.</p> <p>10 Q. You say yes to that?</p> <p>11 A. Yes.</p> <p>12 Q. And Mr. Kim on July 14 at 11:20 a.m.,</p> <p>13 he text you again "When you're available, please call</p> <p>14 me." Correct?</p> <p>15 A. Correct.</p> <p>16 Q. In response to that you said "My phone</p> <p>17 is not working well. Call me now." Correct?</p> <p>18 A. Yes.</p> <p>19 Q. And on July 29, 9:29 a.m., Mr. Kim</p> <p>20 texts you again saying "Mr., when are you coming to</p> <p>21 pick up the check for severance?" Correct?</p> <p>22 A. Yes.</p> <p>23 Q. So you got this text, correct?</p> <p>24 A. Yes.</p> <p>25 Q. Now, Mr. Nam, why did you say -- why</p>	<p>1 that?</p> <p>2 A. Yes.</p> <p>3 Q. You said "Understood." Correct?</p> <p>4 A. Yes.</p> <p>5 Q. Now, on August 13th Mr. Kim texts you</p> <p>6 again "Please let me know your account information so</p> <p>7 that I can send you severance payment information."</p> <p>8 Do you see that?</p> <p>9 A. Yes.</p> <p>10 Q. You responded to that saying you're</p> <p>11 fishing, correct?</p> <p>12 A. Yes.</p> <p>13 Q. And Mr. Kim asked you "Are you not</p> <p>14 coming to pick up the check for severance?"</p> <p>15 A. Correct.</p> <p>16 Q. He asked you again?</p> <p>17 A. Yes.</p> <p>18 Q. You said "Thank you for taking care of</p> <p>19 this matter." Do you see your text there?</p> <p>20 A. Yes.</p> <p>21 Q. Right?</p> <p>22 A. Correct.</p> <p>23 Q. And you said "I can give you my wire</p> <p>24 transfer information," correct?</p> <p>25 A. Yes.</p>
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<p>1 did you lie earlier that Mr. Kim never contacted you</p> <p>2 about severance?</p> <p>3 A. You know, I mean, it was never verbally</p> <p>4 communicated. What I was trying to say was that I</p> <p>5 was told multiple times the severance pay was</p> <p>6 available, however, I was not given a specific date</p> <p>7 as to when the severance check would be available.</p> <p>8 Q. In fact, if you turn to the next page,</p> <p>9 you said on July 29, "I'll go see you on Monday or</p> <p>10 Tuesday because I'm in Maryland right now." Do you</p> <p>11 see that text?</p> <p>12 A. Yes.</p> <p>13 Q. And then Mr. Kim responded to you</p> <p>14 saying "Okay. I'll see you then." Do you see that?</p> <p>15 A. Yes.</p> <p>16 Q. But you never went there on that day,</p> <p>17 correct?</p> <p>18 A. Correct.</p> <p>19 Q. And August 2nd at 1:50 p.m. Mr. Kim</p> <p>20 texts you again "Can I speak to you?"</p> <p>21 A. Yes.</p> <p>22 Q. You said "in 40 minutes," correct?</p> <p>23 A. Yes.</p> <p>24 Q. And Mr. Kim then said "I'll call you to</p> <p>25 discuss your severance at the time." Do you see</p>	<p>1 Q. In response Mr. Kim said "Let me know</p> <p>2 so that I can wire it," correct?</p> <p>3 A. Yes.</p> <p>4 Q. You did not provide your wiring</p> <p>5 information, did you?</p> <p>6 A. Correct.</p> <p>7 Q. So, once again, Mr. Nam, look me in the</p> <p>8 eye, why did you lie that no one at the Mission</p> <p>9 contacted you about severance?</p> <p>10 A. I never said no one contacted me. I</p> <p>11 said that I never received a specific information as</p> <p>12 to when and where I would be receiving the severance</p> <p>13 check.</p> <p>14 Q. When Mr. Kim time and time again asked</p> <p>15 when you coming to pick up the check, what's your</p> <p>16 wire information, did you ever provide your wire</p> <p>17 information in response?</p> <p>18 MR. ZHU: Objection. Argumentative.</p> <p>19 The documents speaks for itself.</p> <p>20 A. Well, you're insisting that I avoided</p> <p>21 picking up the check. However, I'm just trying to</p> <p>22 explain my situation to you what my situation was at</p> <p>23 the time. I was in Maryland and since I was not in</p> <p>24 New Jersey, I was going to -- and then I was told</p> <p>25 that once I come to New Jersey, the severance pay</p>

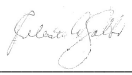
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<p>1 would be paid, however, I was never given information</p> <p>2 as to when and where I should pick up the check.</p> <p>3 Q. On August 17 when Mr. Kim asked you</p> <p>4 about your wire information so they can wire it, you</p> <p>5 never provided that information, did you? Did you or</p> <p>6 did you not?</p> <p>7 A. No.</p> <p>8 MR. ZHU: Objection. Let the witness</p> <p>9 speak. You have to let the witness speak.</p> <p>10 Q. Now, later on you said you don't know</p> <p>11 Mr. Kim's email address, correct?</p> <p>12 A. Yes.</p> <p>13 Q. But you do know his email address,</p> <p>14 correct?</p> <p>15 A. Well, I received his email address once</p> <p>16 and I sent him an email. However, at some point that</p> <p>17 email along with other emails just disappeared from</p> <p>18 my records. So I contacted Microsoft and I found out</p> <p>19 those information -- those emails were gone.</p> <p>20 Q. Then Mr. Kim asked you again "What is</p> <p>21 your home address so that we can mail it?"</p> <p>22 A. Yes.</p> <p>23 Q. Now, he asked you what your bank</p> <p>24 account information was; you never did provide it.</p> <p>25 He asked you what your mailing address was; you never</p>	<p>1 showing that you contacted Mr. Kim after August 17,</p> <p>2 2021. If you lied, you are committing perjury here.</p> <p>3 MR. ZHU: Objection. Argumentative.</p> <p>4 Is there a question pending?</p> <p>5 MR. LIM: Yes.</p> <p>6 Q. Do you understand that, sir?</p> <p>7 A. How am I going to find the recording of</p> <p>8 our conversation?</p> <p>9 Q. I want you to contact your phone</p> <p>10 company, get a phone record for the month of August</p> <p>11 2021.</p> <p>12 MR. ZHU: Objection. No question</p> <p>13 pending.</p> <p>14 MR. LIM: Okay, I'm telling him.</p> <p>15 Q. And produce the record that</p> <p>16 indicates --</p> <p>17 MR. ZHU: Please --</p> <p>18 MR. LIM: Excuse me, I'm speaking.</p> <p>19 Q. What did you say just say, sir? What</p> <p>20 did you just say?</p> <p>21 A. Why the heck --</p> <p>22 MR. LIM: Go off the record.</p> <p>23 (Discussion off the record.)</p> <p>24 MR. ZHU: Now we're back on the record.</p> <p>25 Put on the record, please ask the question. Do</p>
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<p>1 provided, correct? Correct? Did you?</p> <p>2 A. Yes, I did once.</p> <p>3 Q. Okay. Show me your text.</p> <p>4 A. My recollection is that when we were on</p> <p>5 the phone, I gave him my address.</p> <p>6 Q. So it must be after August 17.</p> <p>7 MR. ZHU: Is there a question?</p> <p>8 Q. Correct?</p> <p>9 A. No, they knew my address. I don't</p> <p>10 remember ever receiving any emails from Mr. Kim,</p> <p>11 however, I may have mailed a letter with my address</p> <p>12 in it.</p> <p>13 Q. In response to Mr. Kim's last text</p> <p>14 which is on August 17, did you respond to this? When</p> <p>15 he asked you whether or not he should mail it to your</p> <p>16 home address, did you respond to that?</p> <p>17 A. I had a phone call afterward and I told</p> <p>18 him to send it.</p> <p>19 Q. Okay. Now, do you have the same phone</p> <p>20 with you?</p> <p>21 A. No, I don't have the same phone with me</p> <p>22 but using my previous phone, that's what I said.</p> <p>23 Q. When did you change your phone?</p> <p>24 A. In September.</p> <p>25 (REQ) Q. I want you to produce phone records</p>	<p>1 not harass my client.</p> <p>2 (REQ) Q. Excuse me. Please produce a phone record</p> <p>3 that indicates that you did speak to Mr. Kim after</p> <p>4 August 17. Okay? We're going to follow up on this</p> <p>5 request.</p> <p>6 MR. ZHU: We take it under advisement</p> <p>7 and we request that request to be put in writing.</p> <p>8 Q. Can you explain to me why you did not</p> <p>9 go the following Monday or Tuesday as you promised</p> <p>10 you would according to your text?</p> <p>11 A. Now, at the time my plan was to go to</p> <p>12 New Jersey, however, I got busy with other matters in</p> <p>13 Maryland.</p> <p>14 Q. Did you notify the Mission that you</p> <p>15 cannot make it either on Monday or Tuesday?</p> <p>16 A. I don't recall. I may have.</p> <p>17 MR. LIM: Give me five minutes. I'm</p> <p>18 going to review my questions and maybe we'll be done.</p> <p>19 (Recess taken.)</p> <p>20 BY MR. LIM:</p> <p>21 Q. Mr. Nam, did you know or do you know</p> <p>22 that according to South Korean laws even if you sign</p> <p>23 a contract for a term of one year, if you end up</p> <p>24 working more than two years, you are required to</p> <p>25 retire at the age of 60? Did you know that or do you</p>

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<p>1 know that?</p> <p>2 A. Yes. Now, at the time I didn't know</p> <p>3 about it but at some point I saw on the Internet that</p> <p>4 if I worked for more than two years, then I would be</p> <p>5 subject to age 60 retirement requirement. This was a</p> <p>6 one-year contract.</p> <p>7 (DIR) Q. And did you ever consult a lawyer</p> <p>8 in Korea whether or not if you end up working for</p> <p>9 more than two years even if you have a one-year</p> <p>10 contract, you are required to retire at the age of</p> <p>11 60?</p> <p>12 MR. ZHU: Objection as privileged</p> <p>13 information. I instruct my client to not answer.</p> <p>14 Do not answer.</p> <p>15 MR. KWAK: That is not privileged.</p> <p>16 MR. LIM: That's not privileged.</p> <p>17 MR. KWAK: Do not answer.</p> <p>18 MR. LIM: Hold on.</p> <p>19 (DIR) Q. I'm not asking what the attorney</p> <p>20 told you. Did you ever contact a lawyer? That's my</p> <p>21 question.</p> <p>22 MR. ZHU: Do not answer.</p> <p>23 MR. LIM: No, that's -- don't do that.</p> <p>24 MR. ZHU: I already did.</p> <p>25 MR. KWAK: Whether someone contacted --</p>	<p>1 MR. ZHU: Objection. Foundation.</p> <p>2 A. Now, this was not a legal consultation</p> <p>3 but what I saw on the Internet was just a question</p> <p>4 and answer and the answer was with regard to somebody</p> <p>5 working more than two years under a one-year</p> <p>6 contract, automatically that employment would be</p> <p>7 considered the long-term contract and that employee</p> <p>8 would be under the mandatory retirement age.</p> <p>9 Q. Okay. There is no question pending.</p> <p>10 MR. ZHU: You have to let the witness</p> <p>11 finish. He hasn't finished.</p> <p>12 Q. Go ahead.</p> <p>13 A. However, it said additionally that if</p> <p>14 you are under a one-year contract, then this doesn't</p> <p>15 apply to you. That's what it said.</p> <p>16 Q. That's what the Internet says?</p> <p>17 A. Yes.</p> <p>18 Q. You don't know the author of that, do</p> <p>19 you?</p> <p>20 A. So this was somebody who works for the</p> <p>21 labor department in Korea and that person was</p> <p>22 answering a question.</p> <p>23 Q. Do you know the name of the person?</p> <p>24 A. I do not know.</p> <p>25 MR. LIM: Mark this.</p>
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<p>1 MR. LIM: Contacted is not privileged</p> <p>2 information.</p> <p>3 MR. ZHU: You have the substance.</p> <p>4 MR. KWAK: Their discussion is --</p> <p>5 MR. ZHU: That is substance.</p> <p>6 MR. KWAK: It's contacting a lawyer to</p> <p>7 seek legal advice. That's it.</p> <p>8 MR. LIM: We're going to rephrase the</p> <p>9 question.</p> <p>10 MR. ZHU: Rephrase the question.</p> <p>11 BY MR. LIM:</p> <p>12 Q. Did you ever contact a lawyer in Korea?</p> <p>13 MR. ZHU: Don't put a subject.</p> <p>14 Q. Did you ever contact a lawyer in Korea</p> <p>15 to find out about the labor laws?</p> <p>16 A. No.</p> <p>17 Q. So all your knowledge of South Korean</p> <p>18 labor law is based on what you saw on the Internet?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. So as you sit here today, is</p> <p>21 this the first time you ever heard that in Korea even</p> <p>22 if you have a one-year contract, if you end up</p> <p>23 working more than two years, the mandatory retirement</p> <p>24 age would apply? This is the first time you heard</p> <p>25 it?</p>	<p>1 (Defendant's Exhibit 15, letter from</p> <p>2 the Ministry of Foreign Affairs of the</p> <p>3 Republic of Korea, was marked for</p> <p>4 identification.)</p> <p>5 Q. Well, Mr. Nam, you just testified that</p> <p>6 when you checked someone at the Department of Labor</p> <p>7 via Internet, the answer you received was it really</p> <p>8 depends on the policy of the organization that you</p> <p>9 work for, correct?</p> <p>10 A. Yes, as far as I can remember, that's</p> <p>11 what it said.</p> <p>12 Q. Okay. According to the internal</p> <p>13 policies of the Mission, are you aware that according</p> <p>14 to Article 62 retirement age is at 60?</p> <p>15 MR. ZHU: Objection. Foundation.</p> <p>16 Q. Do you know that?</p> <p>17 A. I didn't know about it.</p> <p>18 Q. Now, if you look at Article 64, it</p> <p>19 shows how severance should be paid. And do you know</p> <p>20 whether or not the severance you have not picked up</p> <p>21 yet -- strike that.</p> <p>22 Do you know that the severance you have</p> <p>23 not picked up yet has been computed based on Article</p> <p>24 64?</p> <p>25 A. I didn't know about it. I thought it</p>

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<p style="text-align: right;">Page 130</p> <p>1 was calculated based on the calculation that appears</p> <p>2 on my employment contract.</p> <p>3 Q. Isn't it true that Mr. Jo here also</p> <p>4 told you that according to this internal policy, the</p> <p>5 Ministry of Foreign Affairs Guidelines, you had to</p> <p>6 retire at the age of 60? Didn't they tell you that,</p> <p>7 correct?</p> <p>8 A. Yes.</p> <p>9 Q. Nothing further.</p> <p>10 MR. ZHU: I have a few follow-up.</p> <p>11 Redirect.</p> <p>12 EXAMINATION</p> <p>13 BY MR. ZHU:</p> <p>14 Q. Earlier you said you need to clarify a</p> <p>15 question concerning whether any driver drove the car</p> <p>16 you being assigned. You said you have something to</p> <p>17 clarify. Can you speak it now?</p> <p>18 A. I was told that the official vehicle</p> <p>19 shall be used for official purposes only and I</p> <p>20 strictly abide by that rule. And, however, from time</p> <p>21 to time when I had to go to work not for work</p> <p>22 purposes, on weekends, I did use that vehicle.</p> <p>23 Q. I put what's in front of you D-2, Bates</p> <p>24 stamped 19. Earlier you said you have something to</p> <p>25 say about minister's signature. What are you about</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. All right. I have no further</p> <p>2 questions.</p> <p>3 MR. LIM: Okay. Thank you.</p> <p>4 (Witness excused.)</p> <p>5 (Time noted: 3:54 p.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 131</p> <p>1 to say at that time?</p> <p>2 A. Are you talking about the signature of</p> <p>3 Mr. Ko?</p> <p>4 Q. Yes.</p> <p>5 A. No, I have nothing to say about that</p> <p>6 signature.</p> <p>7 Q. Okay.</p> <p>8 A. I mean, I wanted to say that prior to</p> <p>9 signing this document, I didn't have sufficient time</p> <p>10 to read and understand this document and therefore I</p> <p>11 didn't fully understand the content of this document.</p> <p>12 However, my signing this document was more of a</p> <p>13 reactionary -- it was reactionary more than anything</p> <p>14 else.</p> <p>15 Q. Earlier you gave some testimony about</p> <p>16 the national interests of the Republic of Korea. Can</p> <p>17 you specify your understanding of the national</p> <p>18 interests of the Republic of Korea, what does that</p> <p>19 mean?</p> <p>20 A. I never really thought about national</p> <p>21 interests, I just focused on what I could do as far</p> <p>22 as what I was -- as far as the test that I was given</p> <p>23 and so I drove an official car. I assisted these</p> <p>24 officers by driving them and I believe that's how I</p> <p>25 was helping the national interest.</p>	<p style="text-align: right;">Page 133</p> <p>1 C E R T I F I C A T E</p> <p>2 STATE OF NEW YORK)</p> <p>3 :ss.</p> <p>4 COUNTY OF NEW YORK)</p> <p>5</p> <p>6 I, CELESTE A. GALBO, a Registered</p> <p>7 Professional Reporter, Register Merit Reporter and</p> <p>8 Notary Public of the State of New York and State of</p> <p>9 New Jersey, do hereby certify:</p> <p>10 THAT HYUNHUY NAM the witness whose</p> <p>11 deposition is hereinbefore set forth, was remotely</p> <p>12 duly sworn by me and that such deposition is a true</p> <p>13 record of the testimony given by the witness.</p> <p>14 I further certify that I am not related</p> <p>15 to any of the parties to this action by blood or</p> <p>16 marriage, and that I am in no way interested in the</p> <p>17 outcome of this matter.</p> <p>18 IN WITNESS WHEREOF, I have hereunto set</p> <p>19 my hand this 28th day of February 2022.</p> <p>20</p> <p>21 </p> <p>22 _____</p> <p>23 CELESTE A. GALBO, RPR, RMR</p> <p>24</p> <p>25</p>

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<div style="text-align: center;">DEPOSITION ERRATA SHEET</div> <p>Case Caption: Hyunhuy Nam vs. Permanent Mission of the Republic of Korea to the United Nations</p> <p align="center">DECLARATION UNDER PENALTY OF PERJURY</p> <p>I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.</p> <p align="center">HYUNHUY NAM</p> <p>Subscribed and sworn to on the ____day of _____, 20__ before me.</p> <p>_____ Notary Public, In and for the State of New York</p>	<div style="text-align: center;">DEPOSITION ERRATA SHEET</div> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>SIGNATURE:_____DATE:_____</p>
<div style="text-align: center;">DEPOSITION ERRATA SHEET</div> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p> <p>Page No.____Line No.____Change to:_____</p> <p>Reason for change:_____</p>	